

PART 70

PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth herein.

Operating Permit: #####-###
Expiration Date: Month DD, YYYY
Installation ID: 229-0001
Project: 2023-09-019

Installation Name and Address

Hutchens Industries, Inc. Mansfield
898 East Commercial Street
Mansfield, MO 65704
Wright County, S2, T28N, R17W

Owner/Operator Name and Address

Hutchens Industries, Inc.
215 N Patterson Ave
Springfield, MO 65802

Installation Description:

Hutchens Industries, Inc. Mansfield manufactures truck trailer suspensions. Operations at the installation include welding and surface coating of metal parts. There are natural gas-fired furnaces, ovens, and heated tanks. The installation is a major source of PM₁₀, PM_{2.5}, and VOC, and a synthetic area source of HAP. The installation is a minor source of all other criteria pollutants.

The installation is subject to GACT CCCCCC. Hutchens Industries, Inc. Mansfield has obtained an exemption letter from EPA regarding GACT HHHHHH, see Attachment K.

Month DD, YYYY
Effective Date

Director or Designee
Department of Natural Resources

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STATEMENT OF BASIS

The purpose of this Statement of Basis is to explain the facts and reasoning behind the decisions made while drafting this permit. This Statement of Basis is not enforceable and only sets forth the legal and factual basis for the applicable requirements applied in the permit. The permit itself is contained within Sections I through VI of this document.

This Statement of Basis does not establish policy or guidance.

INSTALLATION DESCRIPTION

Hutchens Industries, Inc. Mansfield manufactures truck trailer suspensions. Operations at the installation include welding and surface coating of metal parts. There are natural gas-fired furnaces, ovens, and heated tanks. The installation is a major source of PM₁₀, PM_{2.5}, and VOC, and a synthetic area source of HAP. The installation is a minor source of all other criteria pollutants. The installation is subject to GACT CCCCCC. Hutchens Industries, Inc. Mansfield has obtained an exemption letter from EPA regarding GACT HHHHHH, see Attachment K.

The following emission units have been added to the installation since the issuance of the last operating permit under Permit 012020-009.

Emission Unit	Description
EP-38A	Robotic Spray Booths (2), 30 gal/hr
EP-38B	Manual Spray Booth – Initial Touch Up, 4.5 gal/hr
EP-39	Paint Cure Oven, 4 MMBtu/hr, natural gas
EP-40	Manual Spray Booth – Final Touch Up, 1.0 gal/hr

The installation is not on the List of Named Installations found at 10 CSR 10-6.020(3)(B), Table 2; therefore, fugitive emissions are not counted towards major source applicability.

Installation Emissions Profile (tpy)

Pollutants	MoEIS Reported Actual Emissions					PTE ¹
	2020	2021	2022	2023	2024	
PM ₁₀	9.86	5.83	5.15	4.56	3.84	198.64
PM _{2.5}	9.80	5.77	5.15	4.56	3.78	196.67
SO _x	0.01	0.02	0.02	0.02	0.00	0.10
NO _x	1.79	2.73	3.85	3.73	0.00	16.76
VOC	142.48	82.58	77.85	89.25	51.45	<250
CO	1.50	2.29	3.23	3.13	0.00	14.08
HAPs	2.63	3.63	3.11	2.85	1.58	<10.0/25.0

¹ Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted:

- PTE includes control devices required by Permit Condition 004, 005, and 006.
- Potential emissions of VOC and Combined HAP and Individual HAP are based on the installation-wide emission limits in Permit Condition PW001.

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

1. Part 70 Operating Permit Application, received September 24, 2023
2. 2020, 2021, 2022, 2023, and 2024 EIQs
3. U.S. EPA document AP-42, Compilation of Air Pollutant Emission Factors; Volume I, Stationary Point and Area Sources, Fifth Edition
4. WebFIRE
5. Construction Permits: 0691-015, 082009-009, 102011-008A, 012017-011, and 012020-009

Construction Permit History

Construction Permit 0691-015, Issued June 18, 1991

- Minor NSR permit for the installation of two pyrolysis furnaces and four spray booths.
- The four spray booths and one of the two pyrolysis furnaces were never installed.
- Special Conditions 1, 2, 3, 4, and 5 have been applied in Permit Condition 002.
- Special Conditions 6, 7, and 8 applied to the spray booths, and since the spray booths were not installed, these special conditions have not been included in this operating permit.

Construction Permit 0596-008, Issued May 3, 1996

- Minor NSR permit for the conversion of existing solvent-based primer spray paint system to a water reducible spray paint system and installation of an LPG burner and spray booth.
- The new equipment included in this construction permit were never installed, therefore the special conditions have not been included in this operating permit.

Construction Permit 0996-006, Issued September 10, 1996

- Minor NSR permit for the installation of an enclosed sawdust storage system, propane lumber drying kiln, and a robotic welding line. The equipment has since been removed.
- This construction permit contains no special conditions.

Construction Permit 1197-001, Issued October 14, 1997

- Minor NSR permit for the installation of a dry plasma metal cutting torch (EP-26).
- This construction permit contains no special conditions.

Construction Permit 0298-006, Issued January 20, 1998

- Minor NSR permit for the installation of a paint booth with a spray gun (EP-27).
- This construction permit contains no special conditions.

Construction Permit 062003-007, Issued June 9, 2003

- Minor NSR permit for the installation of a primer dip tank.
- This construction permit contains no special conditions.

Construction Permit 122003-005, Issued November 14, 2003

- Minor NSR permit for the installation of welding assembly area and combining various welding emission units under one emission point (EP-32).
- This construction permit contains no special conditions.

Construction Permit 062007-013, Issued June 28, 2007

- Minor NSR permit to revise conditions of Construction Permit 062003-007 to increase the length of the circular conveyor and increase the MHDR of the dip paint tank.
- Special Condition 1 requires the permittee to comply with MACT MMMM. This special condition is not included in this operating permit since MACT MMMM no longer applies to the installation. See the MACT Applicability section below.

Construction Permit 082009-009, Issued August 20, 2009

- Minor NSR permit for the installation of a 2,500-gallon water reducible dip paint tank, a 1,200-gallon heated alkaline wash tank, a 600-gallon heated iron phosphate wash tank, two 600-gallon rise tanks, a 600-gallon seal tank, a non-heated air blow off system, and a heated paint curing room with overhead conveyor.
- Special Conditions 1 and 2 have been applied in Permit Condition 003.
- Special Condition 3 requires the installation to submit potential emission calculations. Since this is a one-time requirement, it has not been included in this operating permit.

Construction Permit 102011-008, Issued October 17, 2011

- Minor NSR permit for the installation of a controlled pyrolysis cleaning furnace.
- The special conditions were superseded by Construction Permit 112011-008A.

Construction Permit 102011-008A, Issued November 29, 2011

- Amendment to correct the opacity determination procedure in the special conditions of Construction Permit 112011-008.
- Special Condition 1 states that the special conditions of this permit supersede those of Construction Permit 112011-008.
- Special Condition 2 has been applied in Permit Condition 004.

Construction Permit 012017-011, Issued January 18, 2017

- Minor NSR permit for installation of a paint booth and curing oven.
- Special Condition has been superseded by Construction Permit 012020-009.
- Special Conditions 2, 3, 4, and 5 have been applied in Permit Condition 005.

Construction Permit 012020-009, Issued January 15, 2020

- Minor NSR permit for the construction of two robotic spray booths (EP-38a), a manual initial spray touch-up booth (EP-38b), a curing oven (EP-39), and a manual final spray touch-up booth (EP-40).
- Special Condition 1 states that the special conditions of this permit supersede Special Condition 1 of Construction Permit 012017-011.
- Special Conditions 2, 3, 4, 5, 6, and 7 have been applied in Permit Condition 006.

NSPS Applicability

40 CFR Part 60 Subpart E – *Standards of Performance for Incinerators*

- NSPS E applies to incinerators, as defined in §60.51(a): “any furnace used in the process of burning solid waste for the purpose of reducing the volume of the waste by removing combustible matter”.

- The EPA has previously determined that pyrolysis units are not considered incinerators because they only partially oxidize the solid waste material under starved oxygen conditions, whereas an incinerator operated under oxygen-rich conditions to completely oxidize the material to H₂O and CO₂. See U.S. Environmental Protection Agency Applicability Determination Index (ADI) Control Number E009, dated January 19, 1977. Therefore, NSPS E does not apply to the pyrolysis furnaces at the installation.

40 CFR Part 60 Subpart K – *Standards of Performance for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978*; Subpart Ka – *Standards of Performance for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984*; Subpart Kb – *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, and On or Before October 4, 2023*; **and** Subpart Kc – *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023*

- NSPS K, Ka, Kb, and Kc do not apply to any of the tanks at the installation. All of the tanks are below the capacity threshold for applicability of each regulation, which are as follows:
 - NSPS K and Ka: petroleum liquid tanks greater than 40,000 gallons
 - NSPS Kb: volatile organic liquid tanks greater than or equal to 19,813 gallons (75 m³)
 - NSPS Kc: volatile organic liquid tanks greater than or equal to 20,000 gallons

40 CFR Part 60 Subpart MM – *Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations for Which Construction, Modification, or Reconstruction Commenced After October 5, 1979, and On or Before May 18, 2022*; **and** Subpart MMA – *Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations for Which Construction, Modification, or Reconstruction Commenced After May 18, 2022*

- NSPS MM and MMA apply to surface coating operations at automobile or light-duty truck assembly plants. Automobile and light-duty truck bodies are defined as the exterior surface of an automobile or light-duty truck including hoods, fenders, cargo boxes, doors, and grill opening panels.
- This installation manufacturers truck trailer suspensions, which do not fall under the definition above. Therefore, NSPS MM and MMA do not apply to the installation.

40 CFR Part 60 Subpart CCCC – *Standards of Performance for Commercial and Industrial Solid Waste Incineration Units*; Subpart DDDD – *Emission Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units*; Subpart EEEE – *Standards of Performance for Other Solid Waste Incineration Units*; **and** Subpart FFFF – *Emission Guidelines and Compliance Times for Other Solid Waste Incineration Units*

- NSPS CCCC and DDDD apply to commercial and industrial solid waste incineration units (CISWIs).
- NSPS EEEE and FFFF apply to other solid waste incineration units (OSWI).
- The EPA has previously determined that pyrolysis units are not considered incinerators because they only partially oxidize the solid waste material under starved oxygen conditions, whereas an incinerator operated under oxygen-rich conditions to completely oxidize the material to H₂O and CO₂. See U.S. Environmental Protection Agency Applicability

Determination Index (ADI) Control Number E009, dated January 19, 1977. Therefore, the regulations above do not apply to the pyrolysis furnaces at the installation.

MACT Applicability

40 CFR Part 63, Subpart T – *National Emission Standards for Halogenated Solvent Cleaning*

- This regulation applies to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (75-09-2), perchloroethylene (127-18-4), trichloroethylene (79-01-6), 1,1,1-trichloroethane (71-55-6), carbon tetrachloride (56-23-5) or chloroform (67-66-3), or any combination of these, in a total concentration greater than 5% by weight, as a cleaning and/or drying agent.
- The installation does not use any halogenated cleaning solvents, therefore MACT T does not apply.

40 CFR Part 63, Subpart IIII – *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks*

- This regulation applies to each facility that is a major source of HAPs and which surface coats new automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks.
- The installation is not a major source of HAPs, therefore this regulation does not apply.

40 CFR Part 63, Subpart MMMM – *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*

- This regulation applies to each facility that is a major source of HAPs and that surface coats miscellaneous metal parts and products.
- The installation is not a major source of HAPs, therefore this regulation does not apply.

40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*

- This regulation applies to boilers and process heaters located at major sources of HAPs. Hot water heaters are exempt per §63.7491(d).
- The installation is not a major source of HAPs, therefore this regulation does not apply.

40 CFR Part 63, Subpart CCCCC – *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities*

- This regulation applies to any stationary facility which dispenses gasoline into the fuel tank of a motor vehicle, motor vehicle engine, nonroad vehicle, or nonroad engine.
- This regulation applies to the gasoline storage tank (EP-37) and is applied in Permit Condition 001.

40 CFR Part 63, Subpart HHHHHH – *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*

- This regulation applies to paint stripping operations that using materials containing methylene chloride, autobody refinishing operations, and spray application of coatings containing chromium, lead, manganese, nickel, or cadmium. The installation meets the criteria for applicability in §63.11170(a)(2), however, GACT HHHHHH allows for the permittee to petition the Administrator (EPA) for an exemption from the surface coating

provisions if they can demonstrate that none of the coatings that are spray applied contain the target HAPs (defined in §63.11180 as compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd)).

- The permittee was granted an exemption from the provisions of this regulation by the EPA. The exemption letter is included in this operating permit as Attachment K.

NESHAP Applicability

40 CFR Part 61, Subpart M - *National Standards for Asbestos* applies to the installation and appears in the Core Permit Requirements.

10 CSR Division 10 Applicability

10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*

- The applicability of this regulation is detailed in the following table. 10 CSR 10-6.220 is applied in Permit Condition 007.

Emission Unit	Description	10 CSR 10-6.220 Applicability
EP-12A - H	Robotic Welding Booths #1 - #8	Subject
EP-13A	Spray Booth #1	
EP-13D	Spray Booth #5	
EP-13E	Curing Oven #3, natural gas	Exempt, natural gas 10 CSR 10-6.220(1)(L)
EP-17	Space Heaters, natural gas	
EP-19	Pyrolysis Furnace #1, natural gas	
EP-26	Plasma Torch	Subject
EP-27	Spray Booth #4	
EP-28	Dip Paint Operation #1	No visible emissions
EP-29A	Alkaline Wash #1; heated tank with natural gas burner & non-heated rinse tank	No visible emissions from tanks; Heaters exempt, natural gas 10 CSR 10-6.220(1)(L)
EP-29B	Iron Phosphate Wash #1; heated tank with natural gas burner & non-heated rinse tank	
EP-30	Curing Oven #1, natural gas	
EP-32	Combined Welding	Subject
EP-33	W/R Dip Paint System, non-heated non-chrome seal tank, non-heated air blowoff system, & water reducible dip tank	No visible emissions
EP-34A	Alkaline Wash #2; heated tank with natural gas burner & non-heated rinse tank	No visible emissions from tanks; Heaters exempt, natural gas (10 CSR 10-6.220(1)(L))
EP-34B	Iron Phosphate Wash #2; heated tank with natural gas burner & non-heated rinse tank	
EP-35	Curing Oven #2; 14 natural gas burners	Exempt, natural gas (10 CSR 10-6.220(1)(L))
EP-36	Pyrolysis Furnace #2, natural gas	
EP-37	Gasoline Storage Tank	No visible emissions
EP-38A	Robotic Spray Booths	Subject
EP-38B	Manual Spray Booth – Initial Touch Up	
EP-39	Paint Cure Oven, natural gas	Exempt, natural gas (10 CSR 10-6.220(1)(L))
EP-40	Manual Spray Booth – Final Touch Up	Subject

Emission Unit	Description	10 CSR 10-6.220 Applicability
n/a	Haul Roads	Exempt, fugitive (10 CSR 10-6.220(1)(K))

10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*

- This regulation applies to indirect heating sources with a capacity greater than 350,000 Btu/hr actual heat input.
- The indirect heating units at this installation are exclusively natural gas-fired, therefore they are exempt per 10 CSR 10-6.261(1)(A). In order to maintain the exemption, the permittee must comply with the recordkeeping requirements of 10 CSR 10-6.261(4)(C).

10 CSR 10-6.400, *Restriction of Particulate Matter Emissions from Industrial Processes*

- The following emission units are not subject to 10 CSR 10-6.400 since no particulate matter emissions are expected:

Emission Unit	Description
EP-28	Dip Paint Operation #1
EP-29A	Alkaline Wash #2; heated tank with natural gas burner & non-heated rinse tank ²
EP-29B	Iron Phosphate Wash #2; heated tank with natural gas burner & non-heated rinse tank ²
EP-33	W/R Dip Paint System, non-heated non-chrome seal tank, non-heated air blowoff system, & water reducible dip tank
EP-34A	Alkaline Wash #2; heated tank with natural gas burner & non-heated rinse tank ²
EP-34B	Iron Phosphate Wash #2; heated tank with natural gas burner & non-heated rinse tank ²
EP-37	Gasoline Storage Tank

- The following emission units are not subject to 10 CSR 10-6.400 because natural gas does not meet the definition of “process weight” in 10 CSR 10-6.020.

Emission Unit	Description
EP-13E	Curing Oven #3, natural gas
EP-17	Space Heaters, natural gas
EP-19	Pyrolysis Furnace #1, natural gas
EP-30	Curing Oven #1, natural gas
EP-35	Curing Oven #2, natural gas
EP-36	Pyrolysis Furnace #2, natural gas
EP-39	Paint Cure Oven, natural gas

- Haul Roads are exempt per 10 CSR 10-6.400(1)(A)7 since they are fugitive.

² The wash/dip/rinse tank portions of these emission units are not expected to emit particulate matter. The fuel-burning portions are not subject to 10 CSR 10-6.400 because natural gas does not meet the definition of “process weight” in 10 CSR 10-6.020.

- The following units are exempt per 10 CSR 10-6.400(1)(A)12 for having a particulate emission rate of less than 0.5 pounds PM per hour. Emission units EP-13D, EP-38B, and EP-40 emit less than 0.5 pounds PM per hour when operating the control devices as required by Permit Conditions 005 and 006.

Emission Unit	Description
EP-13D	Spray Booth #5
EP-32	Combined Welding
EP-38B	Manual Spray Booth – Initial Touch Up
EP-40	Manual Spray Booth – Final Touch Up

- The Robotic Welding Booths #1 - #8 (EP-12A - H) and Plasma Torch (EP-26) are subject to 10 CSR 10-6.400 and are determined to always be in compliance with their respective emission limitations. See Permit Condition 008.
- The remaining emission units (EP-13A, EP-27, and EP-38A) are subject to 10 CSR 10-6.400. The following table demonstrates that the emission units are in compliance with their respective emission limitations when the facility is using the materials given in the table. If the permittee wishes to use a new material, they must perform the following calculations using the density and solids content of the new material to confirm that the emission units are in compliance with the emission limitations. See Permit Condition 009.

Emission Unit	Description	MHDR (gal/hr)	Material Name	Density (lb/gal)	Solids Content (lb PM/lb material)	PTE (lb PM/hr) ³
EP-13A	Spray Booth #1	17.5	H/S Black	11.44	0.136	3.03
EP-27	Spray Booth #4	17.5	H/S Black	11.44	0.136	3.02
EP-38A	Robotic Spray Booths (2)	30	SG-500B	5.93	0.56	1.57
		30	SG-500G	6.18	0.57	1.67

Emission Unit	Actual Flowrate (acfm)	Temperature, T _A (°F)	Standard Flowrate (scfm) ⁴	Maximum PM Concentration (gr/dscf) ⁵	Limit (gr/dscf) from 10 CSR 10-6.400(3)(A)2
EP-13A	30,000	77	29,497	0.012	0.062
EP-27	10,995	77	10,811	0.033	0.089
EP-38A	26,400	77	25,957	0.007	0.06
	26,400	77	25,957	0.007	0.06

³ PTE is calculated as follows: [MHDR (gal/hr)] × [Density (lb/gal)] × [Solids Content (lb PM/lb material)] × [1 – Transfer Efficiency] × [1 – Control Efficiency], where the transfer efficiency for EP-13A and EP-27 is 0.45, and for EP-38A is 0.85. The control efficiency for EP-13A and EP-27 is 0.798, and for EP-38A is 0.8949.

⁴ Standard flowrate is calculated as follows: [Actual Flowrate (acfm)] × [(T_{STP}/T_A)] × [(P_A/P_{STP})], where P_A=P_{STP} and T_{STP} = 68°F = 527.67°R.

⁵ Maximum PM concentration is calculated as follows: [PM PTE (lb/hr)] × [7,000 gr/lb] ÷ [Standard Flowrate (scf/min)] × [1 hr/60 min].

10 CSR 10-6.405, *Restriction of Particulate Matter Emissions from Fuel Burning Equipment Used for Indirect Heating*

- This rule applies to indirect heating units. Natural gas-fired units are exempt per 10 CSR 10-6.405(1)(E), therefore this rule does not apply to the indirect heating units at the facility.

CAM Applicability

40 CFR Part 64 - CAM

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units use a control device to achieve compliance with a relevant standard.

Greenhouse Gas Emissions

Missouri regulations do not require the installation to report CO₂e emissions in their EIQ; therefore, the installation's CO₂e emissions were not included within this permit.

Other Regulatory Determinations

- The following emission units have been dismantled since the issuance of the last operating permit. Therefore, they have not been included in this operating permit.

Emission Unit	Description
EP-13B	Spray Booth #2
EP-31	Dip Paint Operation #2

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

1. The specific pollutant regulated by that rule is not emitted by the installation;
2. The installation is not in the source category regulated by that rule;
3. The installation is not in the county or specific area that is regulated under the authority of that rule;
4. The installation does not contain the type of emission unit which is regulated by that rule;
5. The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

I. Installation Equipment Listing

Emission Units With Limitations

The following list provides a description of the equipment at this installation that emits air pollutants and that are identified as having Emission Unit-Specific Emission Limitations in Section III of this permit. These emission units are also subject to the Plant Wide Emission Limitations in Section II of this permit.

Emission Unit	Description	Control Equipment	Applicable Requirements
EP-12A	Robotic Welding Booth #1	None	10 CSR 10-6.220, 10 CSR 10-6.400
EP-12B	Robotic Welding Booth #2		
EP-12C	Robotic Welding Booth #3		
EP-12D	Robotic Welding Booth #4		
EP-12E	Robotic Welding Booth #5		
EP-12F	Robotic Welding Booth #6		
EP-12G	Robotic Welding Booth #7		
EP-12H	Robotic Welding Booth #8		
EP-13A	Spray Booth #1, 17.5 gal/hr constructed pre-1996	Nonwoven Synthetic Filter	CP012017-011, 10 CSR 10-6.220
EP-13D	Spray Booth #5, 4.95 gal/hr; epoxy paint booth with conveyor & 2 paint guns, constructed 1/31/2017	C-1D Fabric Mat Filter	
EP-19	Pyrolysis Furnace #1, 0.3 MMBtu/hr, natural gas, constructed 1993	None	CP0691-015
EP-26	Plasma Torch, 0.96 tons steel/hr, dry plasma metal cutting torch, constructed 1997	None	10 CSR 10-6.220, 10 CSR 10-6.400
EP-27	Spray Booth #4, 17.5 gal/hr, constructed pre-1996	Nonwoven Synthetic Filter	
EP-32	Combined Welding, 2.41 1000 lb electrode/hr total	None	10 CSR 10-6.220
EP-33	W/R Dip Paint System, 5.32 gal/hr; 600-gallon non-heated non-chrome seal tank, non-heated air blowoff system, & 2,500-gallon water reducible dip tank, constructed 2009	None	CP082009-009
EP-34A	Alkaline Wash #2; 12,000-gallon heated tank with 1.269 MMBtu/hr natural gas burner & 600-gallon non-heated rinse tank, constructed 2009		
EP-34B	Iron Phosphate Wash #2; 600-gallon heated tank with 0.706 MMBtu/hr natural gas burner & 600-gallon non-heated rinse tank, constructed 2009		
EP-35	Curing Oven #2; 14 natural gas burners, 0.05 MMBtu/hr each & overhead conveyor with line speed 10-15 ft/min, constructed 2009		
EP-36	Pyrolysis Furnace #2, 0.3 MMBtu/hr, natural gas, constructed 7/21/2011	Direct Flame Afterburner	CP102011-008A
EP-37	Gasoline Storage Tank, 300 gallons	None	MACT CCCCCC

Emission Unit	Description	Control Equipment	Applicable Requirements
EP-38A	Robotic Spray Booths (2), 30 gal/hr	FF-38A Fabric Mat Filters	CP012020-009, 10 CSR 10-6.220, 10 CSR 10-6.400
EP-38B	Manual Spray Booth – Initial Touch Up, 4.5 gal/hr	FF-38B Fabric Mat Filters	CP012020-009, 10 CSR 10-6.220
EP-40	Manual Spray Booth – Final Touch Up, 1.0 gal/hr		

Emission Units Without Specific Limitations

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance. These emission units are subject to the Plant Wide Emission Limitations in Section II of this permit.

Emission Unit	Description
EP-13E	Curing Oven #3, 2.0 MMBtu/hr, natural gas, constructed 1/31/2017
EP-17	Space Heaters, 22.75 MMBtu/hr total, natural gas
EP-28	Dip Paint Operation #1, 34.3 gal/hr, constructed 2001
EP-29A	Alkaline Wash #1; 12,000-gallon heated tank with 3.5 MMBtu/hr natural gas burner & 600-gallon non-heated rinse tank; constructed 2000
EP-29B	Iron Phosphate Wash #1; 600-gallon heated tank with 0.9 MMBtu/hr natural gas burner & 6000-gallon non-heated rinse tank, constructed 2000
EP-30	Curing Oven #1, 2.6 MMBtu/hr, natural gas, constructed 2000
EP-39	Paint Cure Oven, 4 MMBtu/hr, natural gas
n/a	Haul Roads

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the CFR, CSR, and Missouri's SIP for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations.

PERMIT CONDITION PW001

10 CSR 10-6.060 Construction Permits Required
Construction Permit 012020-009, Issued January 15, 2020

Emission Limitations:

1. The permittee shall emit less than 250.0 tons of VOCs in any consecutive 12-month period from the entire installation. [Special Condition 2.A]
2. The permittee shall emit less than the SMAL for each individual HAP and less than 25.0 tons of combined HAPs in any consecutive 12-month rolling period from the entire installation. A list of the SMAL values for each individual HAP can be found in Attachment G. [Special Condition 2.B]

Monitoring:

1. The permittee shall develop and use forms to demonstrate compliance with Special Conditions 2.A and 2.B. The forms shall contain, at a minimum, the following information. [Special Condition 2.C]
 - a) Installation name and ID number. [Special Condition 2.C.1]
 - b) Permit number. [Special Condition 2.C.2]
 - c) Current month and 12-month date range. [Special Condition 2.C.3]
 - d) Monthly throughput for each emission unit that emits VOCs or HAPs in the current month. [Special Condition 2.C.4]
 - e) Emission factors for each applicable emission unit: [Special Condition 2.C.5]
 - i) For the paint booths (EP-38A, EP-38B, and EP-40) VOC/HAP content shall be determined from the coating SDS. If a range is given, the highest value shall be used. [Special Condition 2.C.5)a]
 - (1) VOC/volatile HAP emissions shall be calculated using mass balances, assuming that 100% of VOCs/HAP in the coatings are emitted. [Special Condition 2.C.5)a(i)]

$$\text{VOC or Volatile HAP (tpy)} = \text{Gallons of coating} \times \text{Density (lb/gal)} \times (\text{VOC content of Wt\% of HAP}) / 100 \times (1 \text{ ton}/2000 \text{ lb})$$

 - (2) Particulate HAP emissions shall be calculated using mass balances, assuming a transfer efficiency of 85%, 75%, and 60% for EP-38A, EP-38B, and EP-40, respectively, and an overall capture/control efficiency of 89.49% for each of the booths. [Special Condition 2.C.5)a(ii)]

Individual particulate HAP (tpy) = Gallons of coating × Density (lb/gal) × (Wt% of HAP) / 100 × (1 ton/2000 lb) × (100 – Transfer Efficiency (%)) / 100 × (100 – Control Efficiency (%)) / 100

(For metal HAPs and comparison to the SMAL limit only, the individual particulate HAP can be multiplied by the molecular weight of the metal portion divided by the molecular weight of the total compound.)

- ii) For the curing oven (EP-39), the VOC/HAP emission factors shall be taken from AP-42 Section 1.4 *Natural Gas Combustion* (September 1998). [Special Condition 2.C.5)b]
- iii) For all previously permitted emission units, use the VOC/HAP emission calculation methods listed in Attachments H, I, and J of this operating permit. [Special Condition 2.C.5)c]
- f) Monthly emissions for each applicable emission unit. [Special Condition 2.C.6]
- g) Total monthly emissions for VOCs/HAPs. [Special Condition 2.C.7]
- h) 12-month rolling total VOCs/HAPs that includes the sum of all start-up, shutdown, and malfunction emissions, as reported to the Air Pollution Control Program's Compliance/Enforcement Section. [Special Condition 2.C.8]
- i) Indication of compliance with Special Conditions 2.A and 2.B. [Special Condition 2.C.9]

Recordkeeping/Reporting:

- 1. The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used. [Special Condition 7.A]
- 2. The permittee shall report no later than 10 days after the end of the month during which records indicate an exceedance of any of the limitations to the Air Pollution Control Program's Compliance/Enforcement Section at: [Special Condition 7.B]
 - a) PO Box 176, Jefferson City, MO 65102 and AirComplianceReporting@dnr.mo.gov **or**
 - b) Any means that comply with 40 CFR Part 3.
- 3. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit. [10 CSR 10-6.065(5)(C)1.C(III)(b)]

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the CFR, the CSR, and Missouri's SIP for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

PERMIT CONDITION 001 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities		
Emission Unit	Description	Control Equipment
EP-37	Gasoline Storage Tank, 300 gallons	None

General Requirements:

1. If the gasoline dispensing facility (GDF) has a monthly throughput of less than 10,000 gallons of gasoline, the permittee must comply with the requirements in §63.11116. [§63.11111(b)]
2. The permittee shall, upon request of the Administrator, demonstrate that the monthly throughput is less than the 10,000-gallon threshold level. The permittee must keep records to document monthly throughput. Records shall be kept for a period of five years. [§63.11111(e)]
3. If the affected source's throughput ever exceeds an applicable throughput threshold, the affected source will remain subject to the requirements for sources above the threshold, even if the affected source throughput later falls below the applicable throughput threshold. [§63.11111(i)]
4. The permittee must, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.11115(a)]
5. The permittee must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: [§63.11116(a)]
 - a) Minimize gasoline spills; [§63.11116(a)(1)]
 - b) Clean up spills as expeditiously as practicable; [§63.11116(a)(2)]
 - c) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; [§63.11116(a)(3)]
 - d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators. [§63.11116(a)(4)]
6. Portable gasoline containers that meet the requirements of 40 CFR Part 59 Subpart F are considered acceptable for compliance with §63.11116(a)(3). [§63.11116(d)]
7. Table 3 to GACT CCCCCC shows which parts of the General Provisions apply. [§63.11130]

Recordkeeping/Reporting:

1. The permittee must keep applicable records as specified in §63.11125(d). [§63.11115(b)]
 - a) The permittee shall keep records of the occurrence and duration of each malfunction of operation (i.e., process equipment). [§63.11125(d)(1)]
 - b) The permittee shall keep records of actions taken during periods of malfunction to minimize emissions in accordance with §63.11115(a), including corrective actions to restore malfunctioning process equipment to its normal or usual manner of operation. [§63.11125(d)(2)]
2. The permittee is not required to submit notifications or reports as specified in §63.11125, §63.11125, or 40 CFR Part 60 Subpart A, General Provisions, but the permittee must have records available within 24 hours of a request by the Administrator to document the gasoline throughput. [§63.11116(b)]
3. The permittee shall maintain all records required by this permit for not less than five years and shall make them available to Missouri Department of Natural Resources' personnel upon request. [10 CSR 10-6.065(5)(C)1.C(II)(b)I and 10 CSR 10-6.065(5)(C)1.G(V)]
4. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit. [10 CSR 10-6.065(5)(C)1.C(III)(b)]

PERMIT CONDITION 002 10 CSR 10-6.060 Construction Permits Required Construction Permit 0691-015, Issued June 18, 1991		
Emission Unit	Description	Control Equipment
EP-19	Pyrolysis Furnace #1, 0.3 MMBtu/hr, natural gas, constructed 1993	None

Operational Requirements:

1. No plastic or Teflon materials shall be processed in the controlled pyrolysis cleaning furnace. A permit modification shall be obtained from the Missouri Department of Natural Resources prior to any changes in the type or quantities of materials processed in either of these units, other than what is contained in the original construction permit application. [Special Condition 1]
2. Operating personnel must have adequate training and knowledge of the operation of the cleaning furnace. Training shall include the manufacturer's standard operating procedures. [Special Condition 2]
3. The cleaning furnaces shall be operated in accordance with the manufacturer's instructions and guidelines of operation. [Special Condition 3]

Recordkeeping/Reporting:

1. The manufacturer's instructions and guidelines of operation shall be immediately available upon request by Missouri Department of Natural Resources' personnel. [Special Condition 4]
2. A copy of Construction Permit 0691-015 shall be kept at this facility and shall be made available to the Department of Natural Resources' personnel upon request. [Special Condition 5]
3. The permittee shall keep training records for all personnel authorized to operate the controlled pyrolysis cleaning furnace. [10 CSR 10-6.065(5)(C)1.C]
4. The permittee shall maintain all records required by this permit for not less than five years and shall make them available to Missouri Department of Natural Resources' personnel upon request. [10 CSR 10-6.065(5)(C)1.C(II)(b)I and 10 CSR 10-6.065(5)(C)1.G(V)]
5. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit. [10 CSR 10-6.065(5)(C)1.C(III)(b)]

PERMIT CONDITION 003 10 CSR 10-6.060 Construction Permits Required Construction Permit 082009-009, Issued August 20, 2009		
Emission Unit	Description	Control Equipment
EP-33	W/R Dip Paint System, 5.32 gal/hr; 600-gallon non-heated non-chrome seal tank, non-heated air blowoff system, & 2,500-gallon water reducible dip tank, constructed 2009	None
EP-34A	Alkaline Wash #2; 12,000-gallon heated tank with 1.269 MMBtu/hr natural gas burner & 600-gallon non-heated rinse tank, constructed 2009	
EP-34B	Iron Phosphate Wash #2; 600-gallon heated tank with 0.706 MMBtu/hr natural gas burner & 600-gallon non-heated rinse tank, constructed 2009	
EP-35	Curing Oven #2; 14 natural gas burners, 0.05 MMBtu/hr each & overhead conveyor with line speed 10-15 ft/min, constructed 2009	

Emission Limitation:

1. The permittee shall emit less than 40.0 tons of VOCs from the equipment listed in Table 1 in any consecutive 12-month period. [Special Condition 1.A]

Table 1: Equipment Limited to Less than 40 tons of VOC

Emission Point	Description
EP-33	W/R Dip Paint System is a 600-gallon non-heated non-chrome seal tank, one non-heated air blowoff system, one 2,500-gallon water reducible dip paint tank.
EP-34A	Alkaline wash is a 12000-gallon heated tank with a 1,269,00 Btu/hr burner and a 600-gallon non-heated rinse tank.
EP-34B	Iron phosphate wash is a 6000-gallon heated tank with a 706,000 Btu/hr burner and a 6000-gallon non-heated rinse tank.
EP-35	Paint curing system is 14 natural gas burners at 50,000 Btu/hr each and one overhead conveyor with a line speed of 10-15 feet/minute.

2. Attachment E or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 1.A. [Special Condition 1.B]

Operational Requirements:

1. Use of Alternative Coatings in W/R Dip Tank (EP-33) [Special Condition 2]
 - a) When considering using an alternative material in the W/R Dip Tank (EP-33) that is different than a material listed in the Application for Authority to Construct for Construction Permit 082009-009, the permittee shall calculate the potential emissions of VOCs and each individual HAP in the alternative material. [Special Condition 2.A]
 - b) The permittee shall seek approval from the Air Pollution Control Program before use of the alternative material in the following cases: [Special Condition 2.B]
 - i) If the potential VOC emissions for the alternative material is equal to or greater than 40.0 tons per year (tpy) for a paint coating, reducer, or wash chemical. [Special Condition 2.B.i]

- ii) If the potential individual HAP emissions for the alternative material is equal to or greater than the SMAL for any compound listed in Attachment G. [Special Condition 2.B.ii]
- c) Attachment F or an equivalent form shall be used to show compliance with Special Conditions 2.A and 2.B. [Special Condition 2.C]

Recordkeeping:

- 1. The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used in this equipment. [Special Conditions 1.B and 2.C]

Reporting:

- 1. The permittee shall report no later than 10 days after the end of the month during which records from Special Condition 1.C indicate an exceedance of the limitation of Special Condition 1.A to the Air Pollution Control Program's Compliance/Enforcement Section at:
[Special Condition 1.C]
 - a) PO Box 176, Jefferson City, MO 65102 and AirComplianceReporting@dnr.mo.gov **or**
 - b) Any means that comply with 40 CFR Part 3.
- 2. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit. [10 CSR 10-6.065(5)(C)1.C(III)(b)]

PERMIT CONDITION 004 10 CSR 10-6.060 Construction Permits Required Construction Permit 102011-008A, Issued November 29, 2011		
Emission Unit	Description	Control Equipment
EP-36	Pyrolysis Furnace #2, 0.3 MMBtu/hr, natural gas, constructed 7/21/2011	Direct Flame Afterburner

Operational Requirements:

1. The permittee shall use this pyrolysis cleaning oven (EP-36) exclusively to remove non-chlorinated/non-hazardous coatings from metal parts. [Special Condition 2.A]
2. Natural gas shall be the only fuel burned in this oven. [Special Condition 2.B]
3. The permittee shall use a direct flame afterburner to control emissions from the cleaning oven. The afterburner shall be operated at a temperature of at least 1,400 degrees Fahrenheit with more than a one-half (1/2) second residence time to ensure a minimum combustion efficiency of 99.9%. [Special Condition 2.C]
4. The oven shall be equipped with an electric controller, with digital readout, which is able to monitor and display the temperature in the second combustion chamber to an accuracy of plus or minus two percent (2%). [Special Condition 2.D]
5. The oven shall have an opacity of less than ten percent (10%) at all times. [Special Condition 2.E]
 - a) The permittee shall conduct opacity readings on EP-37 using the procedures contained in EPA Method 22. At a minimum, the observer shall be trained and knowledgeable about the effects of visibility of emissions caused by background contrast, ambient lighting, observer relative to lighting, wind, and the presence of uncombined water. Readings are only required when the emission unit is operation and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. [Special Condition 2.E.1]
 - b) If visible emissions are perceived or believed to exceed the applicable opacity standard from EP-36, the permittee would then conduct an opacity observation using EPA Method 9. [Special Condition 2.E.2]

Recordkeeping:

1. The permittee shall maintain all records required by this permit for not less than five years and shall make them available to Missouri Department of Natural Resources' personnel upon request. [10 CSR 10-6.065(5)(C)1.C(II)(b)I and 10 CSR 10-6.065(5)(C)1.G(V)]

Reporting:

1. The permittee shall report no later than 10 days after records indicate an exceedance of any of the emission limitations to the Air Pollution Control Program's Compliance/Enforcement Section at: [10 CSR 10-6.065(5)(C)1.C(III)(c)II]
 - a) PO Box 176, Jefferson City, MO 65102 and AirComplianceReporting@dnr.mo.gov or
 - b) Any means that comply with 40 CFR Part 3.
2. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit. [10 CSR 10-6.065(5)(C)1.C(III)(b)]

PERMIT CONDITION 005

10 CSR 10-6.060 Construction Permits Required
Construction Permit 012017-011, Issued January 18, 2017

Emission Unit	Description	Control Equipment
EP-13D	Spray Booth #5, 4.95 gal/hr; epoxy paint booth with conveyor & 2 paint guns, constructed 1/31/2017	C-1D Fabric Mat Filter

Operational Requirements:

1. Paint Gun Usage Restriction – The permittee shall use no more than two (2) paint guns at a time in the paint booth (EP-13D). [Special Condition 2]
2. Capture Device Requirement – Paint Booth [Special Condition 3]
 - a) The permittee shall capture emissions from the paint booth (EP-13D) by operating according to the manufacturer's specifications. [Special Condition 3.A]
 - b) All doorways into the booth shall be closed during operation. The permittee shall demonstrate compliance with this requirement through the use of manometers, air proving switches, and air solenoids. These devices shall prevent the paint guns from operating in the event that the exhaust system is not operating properly. [Special Condition 3.B and 10 CSR 10-6.065(5)(C)1.C]
3. Control Device Requirement – Fabric Filters [Special Condition 4]
 - a) The permittee shall control emissions from the new paint booth (EP-13D) using fabric filters, as specified in the construction permit application. [Special Condition 4.A]
 - b) The filters shall be operated and maintained in accordance with the manufacturer's specifications. [Special Condition 4.B]
 - c) Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition 4.C]
 - d) The permittee shall maintain a copy of the filter manufacturer's performance warranty on site. [Special Condition 4.D]
 - e) The permittee shall maintain an operating and maintenance log for the paint booths, which shall include the following: [Special Condition 4.E]
 - i) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and [Special Condition 4.E.1]
 - ii) Maintenance activities, with inspection schedule, repair actions, and replacements, etc. [Special Condition 4.E.2]

Recordkeeping/Reporting:

1. The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to Missouri Department of Natural Resources' personnel upon request. [Special Condition 5.A]
2. The permittee shall report no later than 10 days after the end of the month during which records indicate an exceedance of any of the emission limitations to the Air Pollution Control Program's Compliance/Enforcement Section at: [10 CSR 10-6.065(5)(C)1.C(III)(c)II]
 - a) PO Box 176, Jefferson City, MO 65102 and AirComplianceReporting@dnr.mo.gov **or**
 - b) Any means that comply with 40 CFR Part 3.

3. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit. [10 CSR 10-6.065(5)(C)1.C(III)(b)]

PERMIT CONDITION 006

10 CSR 10-6.060 Construction Permits Required
Construction Permit 012020-009, Issued January 15, 2020

Emission Unit	Description	Control Equipment
EP-38A	Robotic Spray Booths (2), 30 gal/hr	FF-38A Fabric Mat Filter
EP-38B	Manual Spray Booth – Initial Touch Up, 4.5 gal/hr	FF-38B Fabric Mat Filter
EP-40	Manual Spray Booth – Final Touch Up, 1.0 gal/hr	

Operational Requirements:

1. Paint Gun Usage Restriction – The permittee shall use the following types of spray guns in the designated paint booth: [Special Condition 3.A]
 - a) EP-38A – Electrostatic air-assisted airless spray guns [Special Condition 3.A.1]
 - b) EP-38B – Air-assisted airless spray guns [Special Condition 3.A.2]
 - c) EP-40 – Conventional air spray equipment [Special Condition 3.A.3]
2. Capture Device Requirement – Paint Booth [Special Condition 4]
 - a) The permittee shall capture emissions from the paint booths by maintaining and operating the paint booths in accordance with manufacturer’s specifications. [Special Condition 4.A]
 - b) All doorways into the booth shall be closed during operation. The permittee shall demonstrate compliance with this requirement through the use of manometers, air proving switches, and air solenoids. These devices shall prevent the paint guns from operating in the event that the exhaust system is not operating properly. [Special Condition 4.B and 10 CSR 10-6.065(5)(C)1.C]
3. Control Device Requirement – Fabric Mat Filters [Special Condition 5]
 - a) The permittee shall control emissions from the paint using fabric mat filters, as specified in the construction permit application. [Special Condition 5.A]
 - b) The filters shall be operated and maintained in accordance with the manufacture’s specifications. [Special Condition 5.B]
 - c) Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition 5.C]
 - d) The permittee shall maintain a copy of the filter manufacturer’s performance warranty on site. [Special Condition 5.D]
 - e) The permittee shall maintain an operating and maintenance log for the paint booths, which shall include the following: [Special Condition 5.E]
 - i) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and [Special Condition 5.E.1]
 - ii) Maintenance activities, with inspection schedule, repair actions, and replacements, etc. [Special Condition 5.E.2]
4. The permittee shall keep the solvents and cleaning solutions in sealed containers whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on all solvent and cleaning solution containers used with this equipment. [Special Condition 6]

Recordkeeping/Reporting:

1. The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used. [Special Condition 7.A]
2. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit. [10 CSR 10-6.065(5)(C)1.C(III)(b)]

PERMIT CONDITION 007		
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants		
Emission Unit	Description	Control Equipment
EP-12A	Robotic Welding Booth #1	None
EP-12B	Robotic Welding Booth #2	
EP-12C	Robotic Welding Booth #3	
EP-12D	Robotic Welding Booth #4	
EP-12E	Robotic Welding Booth #5	
EP-12F	Robotic Welding Booth #6	
EP-12G	Robotic Welding Booth #7	
EP-12H	Robotic Welding Booth #8	
EP-13A	Spray Booth #1, 17.5 gal/hr constructed pre-1996	Nonwoven Synthetic Filter
EP-13D	Spray Booth #5, 4.95 gal/hr; constructed 1/31/2017	C-1D Fabric Mat Filter
EP-26	Plasma Torch, 0.96 tons steel/hr, constructed 1997	None
EP-27	Spray Booth #4, 17.5 gal/hr, constructed pre-1996	Nonwoven Synthetic Filter
EP-32	Combined Welding, 2.41 1000 lb electrode/hr total	None
EP-38A	Robotic Spray Booths (2), 30 gal/hr	FF-38A Fabric Mat Filters
EP-38B	Manual Spray Booth – Initial Touch Up, 4.5 gal/hr	FF-38B Fabric Mat Filters
EP-40	Manual Spray Booth – Final Touch Up, 1.0 gal/hr	

Emission Limitation:

1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20% for any continuous six-minute period. [10 CSR 10-6.220(3)(A)1]
2. Exception: The permittee may discharge into the atmosphere from any emission unit visible emissions with an opacity up to 60% for one continuous six-minute period in any 60 minutes. [10 CSR 10-6.220(3)(A)2]
3. Failure to demonstrate compliance with 10 CSR 10-6.220(3)(A) solely because of the presence of uncombined water shall not be a violation. [10 CSR 10-6.220(3)(B)]

Monitoring:

1. The permittee shall conduct visible emissions observation on these emission units using the procedures contained in U.S. EPA Test Method 22. Each Method 22 observation shall be conducted for a minimum of six-minutes. If no visible emissions are observed from the emission unit using Method 22, then no Method 9 is required for the emission unit. [10 CSR 10-6.065(5)(C)1.C]
2. For emission units with visible emissions, the permittee shall have a certified Method 9 observer conduct a U.S. EPA Test Method 9 opacity observation. The permittee may choose to forego Method 22 observations and instead begin with a Method 9 opacity observation. The certified Method 9 observer shall conduct each Method 9 opacity observation for a minimum of 30-minutes. [10 CSR 10-6.065(5)(C)1.C]
3. For both Method 22 and Method 9, a single observer may conduct observations for up to three emission points within a 15-second interval if the following conditions are met: [10 CSR 10-6.065(5)(C)1.C]

- a) No more than three emission points may be read concurrently. [10 CSR 10-6.065(5)(C)1.C]
- b) All three emission points must be within a 70-degree viewing sector or angle in front of the observer such that the proper sun position can be maintained for all three points. [10 CSR 10-6.065(5)(C)1.C]
- c) If an opacity reading for any one of the three emission points equals or exceeds the applicable standard, then the observer must stop taking readings for the other two points and continue reading just that single point. [10 CSR 10-6.065(5)(C)1.C]
4. Monitoring schedule: [10 CSR 10-6.065(5)(C)1.C]
 - a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks. Should no violation of this regulation be observed during this period then: [10 CSR 10-6.065(5)(C)1.C]
 - i) The permittee shall conduct observations once every two weeks for a period of eight weeks. If a violation is noted, the permittee shall revert to weekly monitoring. Should no violation of this regulation be observed during this period then: [10 CSR 10-6.065(5)(C)1.C]
 - (1) The permittee shall conduct observations once per month. If a violation is noted, the permittee shall revert to weekly monitoring. [10 CSR 10-6.065(5)(C)1.C]
5. If the permittee reverts to weekly monitoring at any time, the monitoring schedule shall progress in an identical manner from the initial monitoring schedule. [10 CSR 10-6.065(5)(C)1.C]
6. Observations are only required when the emission units are operating and when the weather conditions allow. [10 CSR 10-6.065(5)(C)1.C]
7. Issuance of a new, amended, or modified operating permit does not restart the monitoring schedule. [10 CSR 10-6.065(5)(C)1.C]

Recordkeeping:

1. The permittee shall maintain records of all observation results for each emission unit using Attachments B and C or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program. [10 CSR 10-6.065(5)(C)1.C]
2. The permittee shall maintain all records required by this permit for not less than five years and shall make them available to Missouri Department of Natural Resources' personnel upon request. [10 CSR 10-6.065(5)(C)1.C(II)(b)I and 10 CSR 10-6.065(5)(C)1.G(V)]

Reporting:

1. The permittee shall report no later than 10 days after records indicate an exceedance of any of the emission limitations to the Air Pollution Control Program's Compliance/Enforcement Section at: [10 CSR 10-6.065(5)(C)1.C(III)(c)II]
 - a) PO Box 176, Jefferson City, MO 65102 and AirComplianceReporting@dnr.mo.gov **or**
 - b) Any means that comply with 40 CFR Part 3.
2. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit. [10 CSR 10-6.065(5)(C)1.C(III)(b)]

PERMIT CONDITION 008

10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes

Emission Unit	Description	Control Equipment
EP-12A	Robotic Welding Booth #1	None
EP-12B	Robotic Welding Booth #2	
EP-12C	Robotic Welding Booth #3	
EP-12D	Robotic Welding Booth #4	
EP-12E	Robotic Welding Booth #5	
EP-12F	Robotic Welding Booth #6	
EP-12G	Robotic Welding Booth #7	
EP-12H	Robotic Welding Booth #8	
EP-26	Plasma Torch; dry plasma metal cutting torch	

Emission Limitations:

1. The permittee shall not emit particulate matter in excess of 3.99 lb PM per hour from the Plasma Torch (EP-26). [10 CSR 10-6.400(3)(A)1]
2. The permittee shall not emit particulate matter in a concentration in excess of the limitations shown in the table below. [10 CSR 10-6.400(3)(A)2]

Emission Unit	Description	Emission Limit (gr/dscf)
EP-12A	Robotic Welding Booth #1	0.1
EP-12B	Robotic Welding Booth #2	0.1
EP-12C	Robotic Welding Booth #3	0.1
EP-12D	Robotic Welding Booth #4	0.1
EP-12E	Robotic Welding Booth #5	0.1
EP-12F	Robotic Welding Booth #6	0.1
EP-12G	Robotic Welding Booth #7	0.1
EP-12H	Robotic Welding Booth #8	0.1

Plasma Torch Compliance Demonstration:

The Plasma Torch (EP-26) has a maximum hourly design rate of 0.96 tons of steel per hour. Using the emission factor of 1.99 lb PM per ton of steel (calculated from a mass balance), the maximum emission rate for the Plasma Torch is 1.91 lb PM per hour. Therefore, the Plasma Torch (EP-26) will always be in compliance with the emission limitation above.

Robotic Welding Booths Compliance Demonstration:

Each of the Robotic Welding Booths have a maximum hourly design rate (MHDR) of 0.125 1000 lb electrode/hour. The following calculations demonstrate that the Robotic Welding Booths will always be in compliance with the emission limitations of 10 CSR 10-6.400. The emission factor of 5.2 lb PM/1000 lb electrode is obtained from WebFIRE for SCC 30905524.

$$\text{Maximum Emission Rate} = \frac{0.125 \text{ 1000 lb electrode}}{\text{hour}} \times \frac{5.2 \text{ lb PM}}{1000 \text{ lb electrode}} = 0.65 \frac{\text{lb PM}}{\text{hr}};$$

$$\frac{0.65 \text{ lb PM}}{\text{hr}} \times \frac{1 \text{ min}}{1475 \text{ dscf}} \times \frac{1 \text{ hr}}{60 \text{ min}} \times \frac{7000 \text{ gr}}{1 \text{ lb}} = 0.051 \frac{\text{gr}}{\text{dscf}} < 0.1 \text{ gr/dscf};$$

Where $1475 \text{ scfm} = 1500 \text{ acfm} \times \frac{(68^\circ\text{F} + 459.67)}{(77^\circ\text{F} + 459.67)} \times \frac{1 \text{ atm}}{1 \text{ atm}}$; where 1500 acfm is the stack flow rate

Monitoring/Recordkeeping/Reporting:

The Robotic Welding Booths and Plasma Torch demonstrate that they are always in compliance with the emission limits by the calculations shown above. No additional monitoring, recordkeeping, or reporting is required for the Robotic Welding Booths or Plasma Torch for the purposes of this permit condition.

PERMIT CONDITION 009

10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes

Emission Unit	Description	Control Equipment
EP-13A	Spray Booth #1, 17.5 gal/hr constructed pre-1996	Nonwoven Synthetic Filter
EP-27	Spray Booth #4, 17.5 gal/hr, constructed pre-1996	Nonwoven Synthetic Filter
EP-38A	Robotic Spray Booths (2), 30 gal/hr	FF-38A Fabric Mat Filters

Emission Limitations:

1. The permittee shall not emit particulate matter in a concentration in excess of the limitations shown in the table below. [10 CSR 10-6.400(3)(A)2]

Emission Unit	Description	Emission Limit (gr/dscf)
EP-13A	Spray Booth #1	0.062
EP-27	Spray Booth #4	0.089
EP-38A	Robotic Spray Booths (2)	0.06

Operational Requirements:

1. The permittee shall operate the filter system at all times that the associated spray booth is in operation. [10 CSR 10-6.065(5)(C)1.C]
2. The permittee shall operate and maintain the filter and spray booth systems in accordance with the manufacturer's specifications. [10 CSR 10-6.065(5)(C)1.C]
3. The permittee shall inspect the filter and spray booth systems for holes, imperfections, proper installation, and proper operation. Inspections shall occur once per shift. [10 CSR 10-6.065(5)(C)1.C]
4. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for the operating conditions expected to occur (i.e., temperature limits, acidic and alkali resistance, and abrasion resistance). [10 CSR 10-6.065(5)(C)1.C]
5. The permittee shall verify that the control devices are operating properly through the use of manometers, air proving switches, and air solenoids. These devices shall prevent the paint guns from operating in the event that the exhaust system is not operating properly. [10 CSR 10-6.065(5)(C)1.C]

Monitoring/Recordkeeping:

1. The permittee shall keep copies of all SDS for all materials used in the spray booths. If the materials vary from those detailed in the Statement of Basis, the permittee shall perform calculations demonstrating that the particulate emissions comply with the emission limitations. The permittee shall keep all calculations and SDS on site. [10 CSR 10-6.065(5)(C)1.C]
2. The permittee shall maintain a copy of the filter and spray booth manufacturer's specifications on site. [10 CSR 10-6.065(5)(C)1.C]
3. The permittee shall maintain an operating and maintenance log for the filters and spray booths, which shall include the following information. The permittee shall use Attachment D, or an equivalent form, to demonstrate compliance. [10 CSR 10-6.065(5)(C)1.C]
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and [10 CSR 10-6.065(5)(C)1.C]

- b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc. [10 CSR 10-6.065(5)(C)1.C]
- 4. The permittee shall maintain all records required by this permit for not less than five years and shall make them available to Missouri Department of Natural Resources' personnel upon request. [10 CSR 10-6.065(5)(C)1.C(II)(b)I and 10 CSR 10-6.065(5)(C)1.G(V)]

Reporting:

- 1. The permittee shall report no later than 10 days after records indicate an exceedance of any of the emission limitations to the Air Pollution Control Program's Compliance/Enforcement Section at: [10 CSR 10-6.065(5)(C)1.C(III)(c)II]
 - a) PO Box 176, Jefferson City, MO 65102 and AirComplianceReporting@dnr.mo.gov **or**
 - b) Any means that comply with 40 CFR Part 3.
- 2. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit. [10 CSR 10-6.065(5)(C)1.C(III)(b)]

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the CFR, CSR, Missouri's SIP, and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The following are only excerpts from the regulation or code and are provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

1. This regulation prohibits the open burning of the following materials:
 - a) Petroleum-based materials, including but not limited to, tires, asphalt roofing material, carpet, and used oils;
 - b) Asbestos containing materials;
 - c) Trade waste, except untreated wood;
 - d) Construction or demolition waste, except untreated wood;
 - e) Salvage operation waste;
 - f) Household waste on or from properties with five or more residential units, such as mobile home parks or multi-family dwellings;
 - g) Household waste originated from another's property; or
 - h) Durable goods.
2. Open burning of certain materials, in certain areas of the state, and/or during specific times of the year are subject to additional requirements. The permittee should review 10 CSR 10-6.045 and local ordinances to see if additional restrictions apply prior to conducting open burning.

10 CSR 10-6.050 Start-up, Shutdown, and Malfunction Conditions

1. In the event of a malfunction, which results in excess emissions that exceeds one hour, the permittee shall notify the Air Pollution Control Program in the form of a written report submitted within two business days. The written report shall include, at a minimum, the following: [10 CSR 10-6.050(3)(A)]
 - a) Name and location of installation; [10 CSR 10-6.050(3)(A)1]
 - b) Name and telephone number of person responsible for the installation; [10 CSR 10-6.050(3)(A)2]
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered; [10 CSR 10-6.050(3)(A)3]
 - d) Identity of the equipment causing the excess emissions; [10 CSR 10-6.050(3)(A)4]
 - e) Time and duration of the period of excess emissions; [10 CSR 10-6.050(3)(A)5]
 - f) Cause of the excess emissions; [10 CSR 10-6.050(3)(A)6]
 - g) Air pollutants involved; [10 CSR 10-6.050(3)(A)7]
 - h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude; [10 CSR 10-6.050(3)(A)8]
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and [10 CSR 10-6.050(3)(A)9]
 - j) Measures taken to remedy the situation which caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations. [10 CSR 10-6.050(3)(A)10]

2. The permittee shall notify the Air Pollution Control Program at least 10 days prior to any maintenance, start-up, or shutdown activity, which is expected to cause an excess release of emissions that exceeds one hour. If notification cannot be given 10 days prior to any maintenance, start-up, or shutdown activity, which is expected to cause an excess release of emissions that exceeds one hour, notification shall be given as soon as practicable prior to the maintenance, start-up, or shutdown activity. If prior notification is not given for any maintenance, start-up, or shutdown activity which resulted in an excess release of emissions that exceeded one hour, notification shall be given within two business days of the release. In all cases, the notification shall be a written report and include, at a minimum, the following: [10 CSR 10-6.050(3)(B)]
 - a) Name and location of installation; [10 CSR 10-6.050(3)(B)1]
 - b) Name and telephone number of person responsible for the installation; [10 CSR 10-6.050(3)(B)2]
 - c) Identity of the equipment involved in the maintenance, start-up, or shutdown activity; [10 CSR 10-6.050(3)(B)3]
 - d) Time and duration of the period of excess emissions; [10 CSR 10-6.050(3)(B)4]
 - e) Type of activity and the reason for the maintenance, start-up, or shutdown; [10 CSR 10-6.050(3)(B)5]
 - f) Type of air contaminant involved; [10 CSR 10-6.050(3)(B)6]
 - g) Estimate of the magnitude of the excess emissions expressed in the units of the applicable emission control regulation and the operating data and calculations used in estimating the magnitude; [10 CSR 10-6.050(3)(B)7]
 - h) Measures taken to mitigate the extent and duration of the excess emissions; and [10 CSR 10-6.050(3)(B)8]
 - i) Measures taken to remedy the situation which caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations. [10 CSR 10-6.050(3)(B)9]
3. Upon receipt of a notice of excess emissions issued by the Missouri Department of Natural Resources or an agency holding a certificate of authority under §643.140, RSMo, the source to which the notice is issued may provide information showing that the excess emissions were the consequence of a malfunction, start-up, or shutdown. Based upon any information submitted by the source operator and any other pertinent information available, the Director or the commission shall decide whether the excess emissions constitute a malfunction, start-up, or shutdown and whether the nature, extent, and duration of the excess emissions warrant enforcement action under §643.080 or §643.151, RSMo. [10 CSR 10-6.050(3)(C)]
 - a) The information provided by the source operator under 10 CSR 10-6.050(3)(C) shall include, at a minimum, the following: [10 CSR 10-6.050(3)(C)2]
 - i) Written notification per 10 CSR 10-6.050(3)(A) for malfunctions which resulted in excess emissions that exceeded one hour; or [10 CSR 10-6.050(3)(C)2.A]
 - ii) Written notification per 10 CSR 10-6.050(3)(B) for maintenance, start-up, or shutdown activities which resulted in excess emissions that exceeded one hour. [10 CSR 10-6.050(3)(C)2.B]
4. The information specified in 10 CSR 10-6.050(3)(C)2 shall be submitted to the Director not later than 15 days after receipt of the notice of excess emissions. Information regarding the type and amount of emissions and time of the episode shall be recorded and kept on file.

This data shall be included in emissions reported on any required EIQ. [10 CSR 10-6.050(4)(A)]

5. The information submitted according to 10 CSR 10-6.050(3)(A), (3)(B), and (3)(C)2 shall be kept on file at the installation for a period of five years. This data shall be included in emissions reported on any required EIQ. The information shall be available to the Director upon request. [10 CSR 10-6.050(4)(B)]

10 CSR 10-6.060 Construction Permits Required

1. The permittee shall obtain a construction permit prior to any of the following activities: [10 CSR 10-6.060(1)(C)]
 - a) The beginning of actual construction, modification, or major modification of any installation subject to this rule; [10 CSR 10-6.060(1)(C)1]
 - b) Operation after construction, modification, or major modification; or [10 CSR 10-6.060(1)(C)2]
 - c) Operation of any emission unit that has been permanently shut down. [10 CSR 10-6.060(1)(C)3]

10 CSR 10-6.080 NESHAP and

40 CFR Part 61, Subpart M - National Emission Standard for Asbestos

The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M - National Emission Standard for Asbestos.

10 CSR 10-6.110 Reporting Emission Data, Emission Fees, and Process Information

1. The permittee shall pay annual emission fees as listed in 10 CSR 10-6.025(6). [10 CSR 10-6.110(3)(A)1 **State Enforceable Only**]
2. Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request. [10 CSR 10-6.110(3)(D)]
3. All data collected and recorded in accordance with the provisions of this rule shall be retained by the permittee for not less than five years after the end of the calendar year in which the data was collected, and all these records shall be made available upon the Director's request. [10 CSR 10-6.110(4)]
4. The permittee shall collect information as required in 10 CSR 10-6.110(4). The information required in the emissions report is listed in Table 4 of this rule. All data elements must be reported initially and only changed data elements must be reported subsequently. To ensure permit consistency, the Air Pollution Control Program Emissions Inventory Unit will help identify and quantify the data elements in Table 4 of this rule. [10 CSR 10-6.110(4)(A)]
5. The permittee shall submit a Full Emissions Report annually. [10 CSR 10-6.110(4)(B)2.A]
6. The Full Emissions Report shall be submitted either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on EIQ paper forms. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the Director. [10 CSR 10-6.110(4)(C)1]
7. The Full Emissions Report shall be submitted either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on EIQ paper forms.

Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the Director. [10 CSR 10-6.110(4)(C)1]

10 CSR 10-6.130 Controlling Emissions during Episodes of High Air Pollution Potential

The permittee shall submit a purple or maroon plan within 60 days of a request from the Director. [10 CSR 10-6.130(4)]

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceal or dilute an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission. [10 CSR 10-6.150(1)]

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is a State Only permit requirement.

The permittee may not cause, permit, or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. This odor evaluation shall be taken at a location outside of the installation's property boundary. [10 CSR 10-6.165(3)]

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

1. The permittee shall not cause or allow fugitive particulate matter emissions to- [10 CSR 10-6.170(3)(A)1]
 - a) Remain visible in the ambient air beyond the property line of origin. [10 CSR 10-6.170(3)(A)1.B]
 - b) Go beyond the premises of origin in such quantities that the particulate matter may be found on surfaces beyond the property line of origin due to the following activities: [10 CSR 10-6.170(3)(A)1.A]
 - i) Handling, transporting, or storing of any material; [10 CSR 10-6.170(3)(A)1.A(I)]
 - ii) Construction, repair, cleaning, or demolition of a building or its appurtenances; [10 CSR 10-6.170(3)(A)1.A(II)]
 - iii) Construction or use of a road, driveway, or open area; or [10 CSR 10-6.170(3)(A)1.A(III)]
 - iv) Operation of a commercial or industrial facility. [10 CSR 10-6.170(3)(A)1.A(IV)]
2. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the Director. [10 CSR 10-6.170(3)(A)2]
3. Should it be determined that noncompliance has occurred, the Director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following: [10 CSR 10-6.170(3)(B)]
 - a) Revision of procedures involving construction, repair, cleaning, and demolition of buildings and their appurtenances that produce particulate matter emissions; [10 CSR 10-6.170(3)(B)1]
 - b) Paving or frequent cleaning of roads, driveways, and parking lots; [10 CSR 10-6.170(3)(B)2]

- c) Application of dust-free surfaces; [10 CSR 10-6.170(3)(B)3]
- d) Application of water; and [10 CSR 10-6.170(3)(B)4]
- e) Planting and maintenance of vegetative ground cover. [10 CSR 10-6.170(3)(B)5]

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

1. The Director may require the permittee to conduct tests to determine the quantity or nature, or both, of their air contaminant emissions. [10 CSR 10-6.180(3)(A)]
 - a) The Director may specify test methods to be used and observe testing as it is performed. [10 CSR 10-6.180(3)(A)1]
 - b) All tests must be performed by qualified personnel. [10 CSR 10-6.180(3)(A)2]
 - c) The Director shall be provided a copy of the test results in writing and signed by the person responsible for the tests. [10 CSR 10-6.180(3)(A)3]
2. The Director may conduct tests of emissions of air contaminants from any source. Upon the Director's request, the permittee shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants. [10 CSR 10-6.180(3)(B)]

10 CSR 10-6.230 Administrative Penalties

1. Pursuant to §643.085, RSMo, and in addition to any other remedy provided by law, upon determination by the Department that a provision of §643.010–§643.250, RSMo, or a standard, limitation, order or rule promulgated, or a term or condition of any permit has been violated, the Director may issue an order assessing an administrative penalty upon the violator. The amount of the administrative penalty will be determined according to 10 CSR 10-6.230(6). In no event may the total penalty assessed per day of violation exceed the statutory maximum specified in §643.151, RSMo. [10 CSR 10-6.230(3)(A)]
2. An administrative penalty shall not be imposed until the Department has sought to resolve the violations through conference, conciliation and persuasion and shall not be imposed for minor violations. If the violation is resolved through conference, conciliation and persuasion, no administrative penalty shall be assessed unless the violation has caused, or had the potential to cause, a risk to human health or to the environment, or has caused or has potential to cause pollution, or was knowingly committed, or is not a minor violation. [10 CSR 10-6.230(3)(B)]
3. An order assessing an administrative penalty shall be served upon the operator, owner or appropriate representative through United States Postal Service certified mail, return receipt requested, a private courier or messenger service which provides verification of delivery or by hand delivery to the operator's or owner's residence or place of business. An order assessing an administrative penalty shall be considered served if verified receipt is made by the operator, owner or appropriate representative. A refusal to accept, or a rejection of certified mail, private courier or messenger service delivery or by hand delivery of an order assessing an administrative penalty constitutes service of the order. [10 CSR 10-6.230(3)(C)]
4. The Director may at any time withdraw without prejudice any administrative penalty order. [10 CSR 10-6.230(3)(D)]
5. An order assessing an administrative penalty shall describe the nature of the violation(s), the amount of the administrative penalty being assessed and the basis of the penalty calculation. [10 CSR 10-6.230(3)(E)]

10 CSR 10-6.241 Asbestos Projects – Registration, Abatement, Notification, Inspection, Demolition, and Performance Requirements and

10 CSR 10-6.250 Asbestos Projects - Certification, Accreditation, and Business Exemption Requirements

This is a State Only permit requirement.

The permittee shall conduct all asbestos projects in accordance with 10 CSR 10-6.241 and 10 CSR 10-6.250. These rules require asbestos contractors to register with the department, to notify the department of each asbestos project, to allow the department to inspect asbestos projects, and to pay inspection fees. Each person who intends to perform asbestos projects in Missouri must register annually with the Missouri Department of Natural Resources' Air Pollution Control Program. Any person undertaking a demolition or asbestos project must submit a notification to the appropriate agency of the department for each asbestos project and each notification must be accompanied by a fee. Asbestos contractors must allow representatives of the department to conduct inspections of projects and must pay inspection fees. These rules require individuals who work in asbestos projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. These rules require training providers who offer training for asbestos occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. These rules require persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos occupations must first obtain accreditation from the department. Certain business entities who meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos projects.

10 CSR 10-6.280 Compliance Monitoring Usage

1. For submission of compliance certificates, the permittee may use the following in addition to any specified compliance methods: [10 CSR 10-6.280(3)(A)]
 - a) Monitoring methods outlined in 40 CFR Part 64; [10 CSR 10-6.280(3)(A)1]
 - b) Monitoring method(s) approved within this operating permit; and [10 CSR 10-6.280(3)(A)2]
 - c) Any other monitoring methods approved by the Director. [10 CSR 10-6.280(3)(A)3]
2. Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of an applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation: [10 CSR 10-6.280(3)(B)]
 - a) Monitoring methods outlined in 40 CFR Part 64; [10 CSR 10-6.280(3)(B)1]
 - b) A monitoring method approved within this operating permit; and [10 CSR 10-6.280(3)(B)2]
 - c) Compliance test methods specified in 10 CSR 10-6.280 cited as the authority for the emission limitations. [10 CSR 10-6.280(3)(B)3]
3. The following testing, monitoring, or information gathering methods are presumptively credible testing, monitoring, or information gathering methods: [10 CSR 10-6.280(5)]
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030 Sampling Methods for Air Pollution Sources;

- ii) 10 CSR 10-6.040 Reference Methods;
- iii) 10 CSR 10-6.070 NSPS;
- iv) 10 CSR 10-6.075 MACT Regulations; and
- v) 10 CSR 10-6.080 NESHAP; or [10 CSR 10-6.280(5)(A)]
- b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed in 10 CSR 10-6.280(3)(B) or (5)(A). [10 CSR 10-6.280(5)(B)]

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)

1. The permittee shall comply with the ozone-depleting substances (ODS) Phaseout Program, Exemption Programs, Imports & Exports Program, ODS Destruction Program, Stationary Refrigeration and Air Condition Program, Motor Vehicle Air Conditioning Program, Halons Program, Nonessential Products Ban Program, Labeling Program, and Significant New Alternatives Policy (SNAP) Program requirements at 40 CFR Part 82.
 - a) The ODS Phaseout Program bans the production and import of Class I ODS and phases out the production and import of Class II ODS.
 - b) The Exemption Programs exclude specific uses of ODS from the phaseout, such as CFC-MDIs and methyl bromide.
 - c) The Imports & Exports Program establishes recordkeeping, reporting, and other requirements for importing virgin and used Class I and Class II substances.
 - d) The ODS Destruction Program establishes acceptable practices for destroying ODS in the United States.
 - e) The Stationary Refrigeration and Air Conditioning Program establishes service practices, technician certification, sales restrictions, and other requirements for these appliances and systems.
 - f) The Motor Vehicle Air Conditioning Program establishes servicing, technician certification, small can sales restrictions, and other requirements for these air-conditioning systems.
 - g) The Halons Program establishes installation, handling, and emissions requirements for halon fire suppression systems.
 - h) The Nonessential Products Ban Program concerns the ban on sale and introduction into interstate commerce of certain products manufactured with or containing ODS.
 - i) The Labeling Program establishes labeling requirements for ODS containers or products manufactured with ODS.
 - j) The SNAP Program identifies and evaluates substitutes for ozone-depleting substances.

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the CFR, CSR, and Missouri's SIP for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

Permit Duration and Extension of Expired Permits

1. This permit is issued for a term of five years, commencing on the date of issuance. [10 CSR 10-6.065(5)(C)1.B]
2. The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than 18 months. [10 CSR 10-6.065(5)(B)1.A(III)]
3. This permit will expire at the end of this period unless renewed. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of the previous permit, the previous permit shall not expire until the renewal permit is issued or denied. Any permit shield granted under the previous permit shall continue in effect during this period of time. However, the Administrator may invoke its authority under §505(e) of the Act to terminate or revoke and reissue the permit. [10 CSR 10-6.065(5)(E)3.C]

General Record Keeping and Reporting Requirements

1. Record Keeping
 - a) The permittee shall retain records of required monitoring information that include the following: [10 CSR 10-6.065(5)(C)1.C(II)(a)]
 - i) The date, place as defined in the permit, and time of sampling or measurements; [10 CSR 10-6.065(5)(C)1.C(II)(a)I]
 - ii) The date(s) analyses were performed; [10 CSR 10-6.065(5)(C)1.C(II)(a)II]
 - iii) The company or entity that performed the analyses; [10 CSR 10-6.065(5)(C)1.C(II)(a)III]
 - iv) The analytical techniques or methods used; [10 CSR 10-6.065(5)(C)1.C(II)(a)IV]
 - v) The results of these analyses; and [10 CSR 10-6.065(5)(C)1.C(II)(a)V]
 - vi) The operating conditions as existing at the time of sampling or measurement. [10 CSR 10-6.065(5)(C)1.C(II)(a)VI]
 - b) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings when used for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form. [10 CSR 10-6.065(5)(C)1.C(II)(b)I]
 - c) Affected sources under Title IV of the Act have a three-year monitoring data record retention period as required in 40 CFR 75. [10 CSR 10-6.065(5)(C)1.C(II)(b)II]
2. Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program's Compliance and Enforcement Section at:
 - i) PO Box 176, Jefferson City, MO 65102 and AirComplianceReporting@dnr.mo.gov or
 - ii) Any means that comply with 40 CFR Part 3.

- b) The permittee shall submit a report of all required monitoring by: [10 CSR 10-6.065(5)(C)1.C(III)(a)]
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
- c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of this permit; this includes deviations or 40 CFR Part 64 exceedances. [10 CSR 10-6.065(5)(C)1.C(III)(b)]
- d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken. [10 CSR 10-6.065(5)(C)1.C(III)(c)]
 - i) Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported as soon as practicable. [10 CSR 10-6.065(5)(C)1.C(III)(c)I]
 - ii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit. [10 CSR 10-6.065(5)(C)1.C(III)(c)II]
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within 10 days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within 10 days after that, together with any corrected or supplemental information required concerning the deviation. [10 CSR 10-6.065(5)(C)1.C(III)(d)]
- f) The permittee may request confidential treatment of information submitted in any report of deviation. [10 CSR 10-6.065(5)(C)1.C(III)(e)]

Risk Management Plan Under §112(r)

- 1. If applicable, the permittee shall develop and register a risk management plan pursuant to §112(r) of the Act, the permittee shall submit either of the following: [40 CFR 68.215(a)(2)]
 - a) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the dates specified in §68.10(a) through (f) and §68.96(a) and (b)(2)(i). This compliance schedule shall be submitted to: [40 CFR 68.215(a)(2)(i)]
 - i) For anhydrous ammonia: the Air Pollution Control Program's Compliance and Enforcement Section at:
 - (1) PO Box 176, Jefferson City, MO 65102 and AirComplianceReporting@dnr.mo.gov or
 - (2) Any means that comply with 40 CFR Part 3.
 - ii) For all other 40 CFR Part 68 regulated chemicals: EPA using the RMP*eSubmit system accessible through EPA's Central Data Exchange (CDX)
 - b) As part of the installation's annual compliance certification, a certification statement that the source is in compliance with the requirements of 40 CFR Part 68, including the registration and submission of the RMP. [40 CFR 68.215(a)(2)(ii)]

Severability Clause

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit. [10 CSR 10-6.065(5)(C)1.F]

General Requirements

1. The permittee must comply with all the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and reissuance, permit modification, or denial of a permit renewal application. Note: The grounds for termination of a permit under 10 CSR 10-6.065(5)(C)1.G(I) are the same as the grounds for revocation as stated in 10 CSR 10-6.065(5)(E)8.A(I). [10 CSR 10-6.065(5)(C)1.G(I)]
2. The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit [10 CSR 10-6.065(5)(C)1.G(II)]
3. The permit may be modified, revoked, reopened, reissued, or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition. [10 CSR 10-6.065(5)(C)1.G(III)]
4. This permit does not convey any property rights of any sort, or grant any exclusive privilege. [10 CSR 10-6.065(5)(C)1.G(IV)]
5. The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing, or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(5)(C)1. [10 CSR 10-6.065(5)(C)1.G(V)]

Incentive Programs Not Requiring Permit Revisions

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit. [10 CSR 10-6.065(5)(C)1.H]

Reasonably Anticipated Operating Scenarios [10 CSR 10-6.065(5)(C)1.I]

There are no reasonably anticipated operating scenarios.

Compliance Requirements

1. Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official. [10 CSR 10-6.065(5)(C)3.A]
2. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Air Pollution Control Program or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program): [10 CSR 10-6.065(5)(C)3.B]
 - a) Enter upon the permittee's premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit; [10 CSR 10-6.065(5)(C)3.B(I)]
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit; [10 CSR 10-6.065(5)(C)3.B(II)]

- c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and [10 CSR 10-6.065(5)(C)3.B(III)]
- d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit. [10 CSR 10-6.065(5)(C)3.B(IV)]
- 3. Schedule of Compliance: [10 CSR 10-6.065(5)(C)3.C]
 - a) The permittee shall continue to comply with all current applicable requirements listed within this permit.
 - b) The permittee shall comply with all applicable requirements that will become effective during the permit term by the specified compliance date.
- 4. All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following: [10 CSR 10-6.065(5)(C)3.D]
 - a) Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when these activities, milestones, or compliance were achieved, and [10 CSR 10-6.065(5)(C)3.D(I)]
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted. [10 CSR 10-6.065(5)(C)3.D(II)]
- 5. The permittee shall submit an annual certification that they are in compliance with all the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. [10 CSR 10-6.065(5)(C)3.E]
 - a) These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. All deviations and 40 CFR Part 64 exceedances and excursions must be included in the compliance certifications. These certifications shall be submitted to both EPA and the Air Pollution control Program: [10 CSR 10-6.065(5)(C)3.E(I)]
 - i) The Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division, EPA Region 7 at:
 - (1) 11201 Renner Blvd., Lenexa, KS 66219 or
 - (2) Via CEDRI through EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov>)
 - ii) The Air Pollution Control Program's Compliance and Enforcement Section at:
 - (1) PO Box 176, Jefferson City, MO 65102 and AirComplianceReporting@dnr.mo.gov or
 - (2) Any means that comply with 40 CFR Part 3.
 - b) The compliance certification shall include the following: [10 CSR 10-6.065(5)(C)3.E(III)]
 - i) The identification of each term or condition of the permit that is the basis of the certification; [10 CSR 10-6.065(5)(C)3.E(III)(a)]
 - ii) The current compliance status, as shown by monitoring data and other information reasonably available to the permittee; [10 CSR 10-6.065(5)(C)3.E(III)(b)]
 - iii) Whether compliance was continuous or intermittent; [10 CSR 10-6.065(5)(C)3.E(III)(c)]
 - iv) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and [10 CSR 10-6.065(5)(C)3.E(III)(d)]

- v) Such other facts as the Air Pollution Control Program will require to determine the compliance status of this installation. [10 CSR 10-6.065(5)(C)3.E(III)(e)]

Permit Shield

1. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that: [10 CSR 10-6.065(5)(C)6.A]
 - a) The applicable requirements are included and specifically identified in this permit, or [10 CSR 10-6.065(5)(C)6.A(I)]
 - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in this permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it. [10 CSR 10-6.065(5)(C)6.A(II)]
2. Be aware that there are exceptions to this permit protection. The permit shield does not affect the following: [10 CSR 10-6.065(5)(C)6.B]
 - a) The provisions of §303 of the Act or §643.090, RSMo concerning emergency orders; [10 CSR 10-6.065(5)(C)6.B(I)]
 - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance; [10 CSR 10-6.065(5)(C)6.B(II)]
 - c) The applicable requirements of the acid rain program; [10 CSR 10-6.065(5)(C)6.B(III)]
 - d) The authority of EPA and the Air Pollution Control Program to obtain information; or [10 CSR 10-6.065(5)(C)6.B(IV)]
 - e) Any other permit or extra-permit provisions, terms, or conditions expressly excluded from the permit shield provisions. [10 CSR 10-6.065(5)(C)6.B(V)]

Emergency Provisions

1. An emergency or upset means any condition arising from sudden and not reasonably foreseeable events beyond the control of the permittee, including acts of God, which require immediate corrective action to restore normal operation and that causes the installation to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency or upset. An emergency or upset does not include noncompliance caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. [10 CSR 10-6.065(5)(C)7.A]

Operational Flexibility

1. An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described in 10 CSR 10-6.065(5)(C)8.A if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. At least seven days in

advance of these changes, except as allowed for emergency or upset conditions, the permittee shall notify: [10 CSR 10-6.065(5)(C)8]

- a) The Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division, EPA Region 7 at 11201 Renner Blvd., Lenexa, KS 66219 **and**
- b) The Air Pollution Control Program's Compliance and Enforcement Section at:
 - i) PO Box 176, Jefferson City, MO 65102 **and** AirComplianceReporting@dnr.mo.gov **or**
 - ii) Any means that comply with 40 CFR Part 3.
- c) §502(b)(10) changes. Changes that, under §502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting, or compliance requirements of this permit. [10 CSR 10-6.065(5)(C)8.A]
 - i) Before making a change under this provision, the permittee shall provide advance written notice, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with this permit and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to EPA and the Air Pollution Control Program at least seven days before the change is to be made. If less than seven days' notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change. This notice shall be sent to: [10 CSR 10-6.065(5)(C)8.A(I)]
 - (1) The Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division, EPA Region 7 at 11201 Renner Blvd., Lenexa, KS 66219 **and**
 - (2) The Air Pollution Control Program's Compliance and Enforcement Section at:
 - (A) PO Box 176, Jefferson City, MO 65102 **and** AirComplianceReporting@dnr.mo.gov **or**
 - (B) Any means that comply with 40 CFR Part 3.
 - ii) The permit shield shall not apply to these changes. [10 CSR 10-6.065(5)(C)8.A(II)]

Off-Permit Changes

1. Except as provided in 10 CSR 10-6.065(5)(C)9.A, the permittee may make any change in its permitted operations, activities, or emissions that is not addressed in, constrained by, or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in this permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of these off-permit provisions. Off-permit changes shall be subject to the following requirements and restrictions: [10 CSR 10-6.065(5)(C)9]
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification; [10 CSR 10-6.065(5)(C)9.A]
 - b) The permittee must provide contemporaneous written notice of the change. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply because of the

change. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(5)(B)3. This notice shall be sent to: [10 CSR 10-6.065(5)(C)9.B]

- i) The Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division, EPA Region 7 at 11201 Renner Blvd., Lenexa, KS 66219 **and**
- ii) The Air Pollution Control Program's Compliance and Enforcement Section at:
 - (1) PO Box 176, Jefferson City, MO 65102 **and**
AirComplianceReporting@dnr.mo.gov **or**
 - (2) Any means that comply with 40 CFR Part 3.
- c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and [10 CSR 10-6.065(5)(C)9.C]
- d) The permit shield shall not apply to these changes. [10 CSR 10-6.065(5)(C)9.D]

Responsible Official [10 CSR 10-6.065(2)(W)]

The application utilized in the preparation of this permit was signed by Kevin Dobson, HR Director. If this person terminates employment or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the permittee shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the permittee to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements, and covenants.

Reopening-Permit for Cause

1. This permit shall be reopened for cause if: [10 CSR 10-6.065(5)(E)6.A]
 - a) The Air Pollution Control Program receives notice from EPA that a petition for disapproval of this permit pursuant to 40 CFR 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination; [10 CSR 10-6.065(5)(E)6.A(I)]
 - b) The Air Pollution Control Program or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions limitations, standards, or other terms of this permit; [10 CSR 10-6.065(5)(E)6.A(II)]
 - c) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—: [10 CSR 10-6.065(5)(E)6.A(III)]
 - i) This permit has a remaining term of less than three years; [10 CSR 10-6.065(5)(E)6.A(III)(a)]
 - ii) The effective date of the requirement is later than the date on which this permit is due to expire; or [10 CSR 10-6.065(5)(E)6.A(III)(b)]
 - iii) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit; [10 CSR 10-6.065(5)(E)6.A(III)(c)]

- d) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into this permit; or [10 CSR 10-6.065(5)(E)6.A(IV)]
- e) The Air Pollution Control Program or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements. [10 CSR 10-6.065(5)(E)6.A(V)]

Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit. [10 CSR 10-6.065(5)(E)1.C]

VI. Attachments

Attachments follow. Attachment A defines a list of abbreviations and acronyms commonly used throughout this permit.

Attachment A Abbreviations and Acronyms

°C	degrees Celsius	HP	horsepower
°F	degrees Fahrenheit	hr	hour
AAQIA	ambient air quality impact analysis	kgal	1000 gallons
acfm	actual cubic feet per minute	kPa	kilopascals
BACT	best available control technology	kW	kilowatt
BLDS	bag leak detection system	LAER	lowest achievable emission rate
BMPs	best management practices	lb	pound
Btu	British thermal unit	lb/hr	pounds per hour
CAM	compliance assurance monitoring, 40 CFR Part 64	m/s	meters per second
CAS	Chemical Abstracts Service	MACT	maximum achievable control technology, 40 CFR Part 63
CD	control device	MERV	minimum efficiency reporting value
CEMS	continuous emissions monitoring system	Mg	megagrams
CFR	code of federal regulations	mg	milligrams
CO	carbon monoxide	µg/m³	micrograms per cubic meter
CO₂	carbon dioxide	mg/m³	milligrams per cubic meter
CO₂e	carbon dioxide equivalent	MHDR	maximum hourly design rate
COMS	continuous opacity monitoring system	MMBtu	million British thermal units
CSR	code of state regulations	MMgal	million gallons
D/F	dioxins and furans	mmHg	millimeters mercury
dscf	dry standard cubic feet	MMscf	million standard cubic feet
dscm	dry standard cubic meter	MSDS	material safety data sheet
EDS	environmental data sheet	MW	megawatt
EF	emission factor	N/A	not applicable
EIQ	emission inventory questionnaire	N/D	not determined
EP	emission point	NAAQS	national ambient air quality standards
EPA	Environmental Protection Agency	NESHAP	national emissions standards for hazardous air pollutants, 40 CFR Part 61
EU	emission unit	NNSR	nonattainment area new source review
FGD	flue gas desulfurization	NO_x	nitrogen oxides
FIRE	EPA's Factor Information Retrieval System	NSPS	new source performance standards, 40 CFR Part 60
ft	feet	NSR	new source review
ft/s	feet per second	PAL	plantwide applicability limit
g	grams	PFD	process flow diagram
GACT	generally available control technology	PM	particulate matter, includes filterable only
gal	gallons	PM_{2.5}	particulate matter less than 2.5 microns in aerodynamic diameter, filterable and condensable
GHG	greenhouse gas	PM₁₀	particulate matter less than 10 microns in aerodynamic diameter, filterable and condensable
gpm	gallons per minute	PM CON	condensable particulate matter
gr	grains		
gr/dscf	grains per dry standard cubic feet		
GWP	global warming potential		
HAP	hazardous air pollutant		
HCl	hydrogen chloride		
HF	hydrogen fluoride		

ppb	parts per billion	scfm	standard cubic feet per minute
ppm	parts per million	SCR	selective catalytic reduction
ppmv	parts per million by volume	SDS	safety data sheet
ppmw	parts per million by weight	SIC	standard industrial classification
PSD	prevention of significant Deterioration	SIL	significant impact level
psi	pounds per square inch	SIP	state implementation plan
psia	pounds per square inch atmosphere	SMAL	screening model action levels
psig	pounds per square inch gauge	SNCR	selective noncatalytic reduction
PTE	potential to emit	SO_x	sulfur oxides
PW	plantwide	SO₂	sulfur dioxide
RACT	reasonably available control technology	SSM	start-up, shutdown, and malfunction
RAL	risk assessment level	tph	tons per hour
RBLC	RACT/BACT/LAER clearinghouse	tpy	tons per year
RTR	risk and technology review	ULSD	ultra-low sulfur diesel
SAM	sulfuric acid mist	VMT	vehicle miles traveled
SCC	source classification code	VOC	volatile organic compounds
		yr	year

Attachment B
Method 22 Visible Emissions Observations

Installation Name		Observer Name	
Location		Date	
Sky Conditions		Wind Direction	
Precipitation		Wind Speed	
Time		Emission unit(s)	
Sketch emission unit(s): indicate observer position relative to emission unit(s); indicate potential emission points and/or actual emission points.			
Start Time (HH:MM:SS)	Stop Time (HH:MM:SS)	Visible Emissions Yes (Y) or No (N)⁶	Comments

⁶ If visible emissions are observed, the installation is not required to complete the entire six-minute observation. The installation shall note when the visible emissions were observed and shall conduct a Method 9 opacity observation.

Attachment C
Method 9 Opacity Observations

Installation Name:	Sketch of the observer's position relative to the emission unit(s)	
Emission Point(s):		
Emission Unit(s):		
Observer Name and Affiliation:		
Observer Certification Date:		
Method 9 Observation Date:		
Height of Emission Point(s):		
Time:	Start of observations	End of observations
Distance of Observer from Emission Point(s):		
Observer Direction from Emission Point(s):		
Height of Observation Point:		
Approximate Wind Direction:		
Estimated Wind Speed:		
Ambient Temperature:		
Description of Sky Conditions (Presence and color of clouds):		
Plume Color:		
Approximate Distance Plume is Visible from Emission Point(s):		

Attachment C Continued
Method 9 Opacity Observations

Minute	Seconds				1- minute Avg. % Opacity ⁷	6- minute Avg. % Opacity ⁸	Steam Plume (check if applicable)		Comments
	0	15	30	45			(check if applicable)		
	Opacity Readings (% Opacity) ⁹						Attached	Detached	
0						N/A			
1						N/A			
2						N/A			
3						N/A			
4						N/A			
5									
6									
7									
8									
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The emission unit(s) complies if each six-minute average opacity is less than or equal to 20%.
Exception: The emission unit(s) complies if one six-minute average opacity is greater than 20%, but less than 60%.

Was the emission unit(s) in compliance at the time of evaluation (yes or no)?

Signature of Observer

⁷ 1-minute avg. % opacity is the average of the four 15 second opacity readings during the minute.

⁸ 6-minute avg. % opacity is the average of the six most recent 1-minute avg. % opacities.

⁹ Each 15 second opacity reading shall be recorded to the nearest 5% opacity as stated within Method 9.

[illegible]

- 10 Record the name of each material used that contains a VOC as defined in 10 CSR 10-6.020.
- 11 Obtain from the SDS for the material. If specific gravity (s.g.) is listed instead, Material Density (lb/gal) = s.g. x 8.33.
- 12 Obtain from the SDS for the material. If a range of VOC contents is provided, use the highest value within the range.
- 13 Monthly VOC emissions (tons) =
If monthly usage is in gallons: Monthly Usage (gal) x Material Density (lb/gal) x VOC Wt. % x 0.0005 (ton/lb).
If monthly usage is in pounds: Monthly Usage (lb) x VOC Wt. % x 0.0005 (ton/lb).
If monthly usage is in tons: Monthly Usage (tons) x VOC Wt. %.
- 14 AP-42 Section 1.4 "Natural Gas Combustion" (July 1998).
- 15 Monthly VOC emissions (tons) = Monthly Natural Gas Usage (MMscf) x VOC Emission Factor (lb/MMscf) ÷ 2000 lb/ton.
- 16 Sum of the column for monthly VOC emissions for each material and natural gas combustion in tons.
- 17 Start-Up, Shutdown, and Malfunction (SSM) emissions as reported to the Compliance/Enforcement Section in accordance with 10 CSR 10-6.050.
- 18 12-Month Total VOC Emissions of **less than 40 tons** indicates compliance with Permit Condition 003.

Attachment F
CP082009-009 Alternatives Tracking

Copy this sheet as needed.

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6 (a)	Column 7 (b) (c)	Column 8	Column 9 (d) (e)
Material Used (name, type)	HAP Name and CAS #	Application Rate (gal/hr)	Density (lb/gal)	Individual HAP Content (Wt. %)	Individual HAP PTE (tpy)	Screening Model Action Level (tpy)	VOC Content (Wt. %)	VOC PTE (tpy)
<i>Example, paint ABC</i>	<i>MIBK 108-10-1</i>	<i>1.8</i>	<i>8.17</i>	<i>18.54</i>	<i>11.9</i>	<i>10</i>	<i>62.2</i>	<i>40.06</i>

Instructions: Calculate the potential emissions of each individual HAP and total VOCs contained in the material.

- Calculate the potential emissions of each individual HAP: $[\text{Column 6}] = [\text{Column 3}] \times [\text{Column 4}] / 100 \times [\text{Column 5}] \times [8760 \text{ hr/yr}] / [2000 \text{ lb/ton}]$
- Fill in the Screening Model Action Level (SMAL) for the individual HAPs. The SMAL for individual HAPs can be found in Attachment G.
- If [Column 6] is greater than [Column 7], then obtain permission from the Air Pollution Control Program before using this material.
- Calculate the potential emissions of VOC: $[\text{Column 9}] = [\text{Column 3}] \times [\text{Column 4}] \times [\text{Column 8}] / 100 \times [8760 \text{ hr/yr}] / [2000 \text{ lb/ton}]$
- If [Column 9] is greater than 40.0 tpy for the material, then obtain permission from the Air Pollution Control Program before using this material.

Attachment G

Hazardous Air Pollutants and Screening Model Action Levels (SMALs)

Chemical	CAS	SMAL (tpy)	Group ID	VOC	PM	Chemical	CAS	SMAL (tpy)	Group ID	VOC	PM
ACETALDEHYDE	75-07-0	9		Y	N	BUTADIENE, [1,3-]	106-99-0	0.07		Y	N
ACETAMIDE	60-35-5	1		Y	N	BUTOXYETHANOL ACETATE, [2-]	112-07-2	5	P	Y	N
ACETONITRILE	75-05-8	4		Y	N	BUTYLENE OXIDE, [1,2-]	106-88-7	1		Y	N
ACETOPHENONE	98-86-2	1		Y	N	CADMIUM COMPOUNDS		0.01	K	N	Y
ACETYLAMINOFLUORINE, [2-]	53-96-3	0.005	V	Y	Y	CALCIUM CYANAMIDE	156-62-7	10		Y	Y
ACROLEIN	107-02-8	0.04		Y	N	CAPROLACTAM (Delisted)	105-60-2				
ACRYLAMIDE	79-06-1	0.02		Y	N	CAPTAN	133-06-2	10		Y	Y
ACRYLIC ACID	79-10-7	0.6		Y	N	CARBARYL	63-25-2	10	V	Y	Y
ACRYLONITRILE	107-13-1	0.3		Y	N	CARBON DISULFIDE	75-15-0	1		Y	N
ALLYL CHLORIDE	107-05-1	1		Y	N	CARBON TETRACHLORIDE	56-23-5	1		Y	N
AMINOBIIPHENYL, [4-]	92-67-1	1	V	Y	N	CARBONYL SULFIDE	463-58-1	5		Y	N
ANILINE	62-53-3	1		Y	N	CATECHOL	120-80-9	5		Y	N
ANISIDINE, [ORTHO-]	90-04-0	1		Y	N	CHLORAMBEN	133-90-4	1		Y	Y
ANTHRACENE	120-12-7	0.01	V	Y	N	CHLORDANE	57-74-9	0.01		Y	Y
ANTIMONY COMPOUNDS		5	H	N	Y	CHLORINE	7782-50-5	0.1		N	N
ANTIMONY PENTAFLUORIDE	7783-70-2	0.1	H	N	Y	CHLOROACETIC ACID	79-11-8	0.1		Y	N
ANTIMONY POTASSIUM TARTRATE	28300-74-5	1	H	N	Y	CHLOROACETOPHENONE, [2-]	532-27-4	0.06		Y	N
ANTIMONY TRIOXIDE	1309-64-4	1	H	N	Y	CHLOROBENZENE	108-90-7	10		Y	N
ANTIMONY TRISULFIDE	1345-04-6	0.1	H	N	Y	CHLOROBENZILATE	510-15-6	0.4	V	Y	Y
ARSENIC COMPOUNDS		0.005	I	N	Y	CHLOROFORM	67-66-3	0.9		Y	N
ASBESTOS	1332-21-4	0	A	N	Y	CHLOROMETHYL METHYL ETHER	107-30-2	0.1		Y	N
BENZ(A)ANTHRACENE	56-55-3	0.01	V	Y	N	CHLOROPRENE	126-99-8	1		Y	N
BENZENE	71-43-2	2		Y	N	CHROMIUM (VI) COMPOUNDS		0.002	L	N	Y
BENZIDINE	92-87-5	0.0003	V	Y	N	CHROMIUM COMPOUNDS		5	L	N	Y
BENZO(A)PYRENE	50-32-8	0.01	V	Y	N	CHRYSENE	218-01-9	0.01	V	Y	N
BENZO(B)FLUORANTHENE	205-99-2	0.01	V	Y	N	COBALT COMPOUNDS		0.1	M	N	Y
BENZO(K)FLUORANTHENE	207-08-9	0.01	V	Y	N	COKE OVEN EMISSIONS	8007-45-2	0.03	N	Y	N
BENZOTRICHLORIDE	98-07-7	0.006		Y	N	CRESOL, [META-]	108-39-4	1	B	Y	N
BENZYL CHLORIDE	100-44-7	0.1		Y	N	CRESOL, [ORTHO-]	95-48-7	1	B	Y	N
BERYLLIUM COMPOUNDS		0.008	J	N	Y	CRESOL, [PARA-]	106-44-5	1	B	Y	N
BERYLLIUM SALTS		2E-05	J	N	Y	CRESOLS (MIXED ISOMERS)	1319-77-3	1	B	Y	N
BIPHENYL, [1,1-]	92-52-4	10	V	Y	N	CUMENE	98-82-8	10		Y	N
BIS(CHLOROETHYL)ETHER	111-44-4	0.06		Y	N	CYANIDE COMPOUNDS		0.1	O	Y	N
BIS(CHLOROMETHYL)ETHER	542-88-1	0.0003		Y	N	DDE	72-55-9	0.01	V	Y	Y
BROMOFORM	75-25-2	10		Y	N	DI(2-ETHYLHEXYL) PHTHALATE, (DEHP)	117-81-7	5		Y	N
BROMOMETHANE	74-83-9	10		Y	N	DIAMINOTOLUENE, [2,4-]	95-80-7	0.02		Y	N
BROMOPROPANE [1-]	106-94-5	10		Y	N	DIAZOMETHANE	334-88-3	1		Y	N

Chemical	CAS	SMAL (tpy)	Group ID	VOC	PM	Chemical	CAS	SMAL (tpy)	Group ID	VOC	PM
DIBENZ(A,H)ANTHRACENE	53-70-3	0.01	V	Y	N	DIPHENYLMETHANE DIISOCYANATE, [4,4-]	101-68-8	0.1	V	Y	N
DIOXINS/FURANS		6E-07	D,V	Y	N	EPICHLOROHYDRIN	106-89-8	2		Y	N
DIBENZOFURAN	132-64-9	5	V	Y	N	ETHOXYETHANOL, [2-]	110-80-5	10	P	Y	N
DIBROMO-3-CHLOROPROPANE, [1,2-]	96-12-8	0.01		Y	N	ETHOXYETHYL ACETATE, [2-]	111-15-9	5	P	Y	N
DIBROMOETHANE, [1,2-]	106-93-4	0.1		Y	N	ETHYL ACRYLATE	140-88-5	1		Y	N
DIBUTYL PHTHALATE	84-74-2	10		Y	Y	ETHYL BENZENE	100-41-4	10		Y	N
DICHLOROBENZENE, [1,4-]	106-46-7	3		Y	N	ETHYL CHLORIDE	75-00-3	10		Y	N
DICHLOROBENZIDENE, [3,3-]	91-94-1	0.2	V	Y	Y	ETHYLENE GLYCOL	107-21-1	10		Y	N
DICHLOROETHANE, [1,1-]	75-34-3	1		Y	N	ETHYLENE GLYCOL MONOBUTYL ETHER (Delisted)	111-76-2				
DICHLOROETHANE, [1,2-]	107-06-2	0.8		Y	N	ETHYLENE GLYCOL MONOHEXYL ETHER	112-25-4	5	P	Y	N
DICHLOROETHYLENE, [1,1-]	75-35-4	0.4		Y	N	ETHYLENE IMINE [AZIRIDINE]	151-56-4	0.003		Y	N
DICHLOROMETHANE	75-09-2	10		N	N	ETHYLENE OXIDE	75-21-8	0.1		Y	N
DICHLOROPHENOXY ACETIC ACID, [2,4-]	94-75-7	10	C	Y	Y	ETHYLENE THIOUREA	96-45-7	0.6		Y	Y
DICHLOROPROPANE, [1,2-]	78-87-5	1		Y	N	FORMALDEHYDE	50-00-0	2		Y	N
DICHLOROPROPENE, [1,3-]	542-75-6	1		Y	N	GLYCOL ETHER (ETHYLENE GLYCOL ETHERS)		5	P	Y	N
DICHLORVOS	62-73-7	0.2		Y	N	GLYCOL ETHER (DIETHYLENE GLYCOL ETHERS)		5	P	Y	N
DIETHANOLAMINE	111-42-2	5		Y	N	HEPTACHLOR	76-44-8	0.02		Y	N
DIETHYL SULFATE	64-67-5	1		Y	N	HEXACHLOROBENZENE	118-74-1	0.01		Y	N
DIETHYLENE GLYCOL MONOBUTYL ETHER	112-34-5	5	P	Y	N	HEXACHLOROBUTADIENE	87-68-3	0.9		Y	N
DIMETHOXYBENZIDINE, [3,3-]	119-90-4	0.1	V	Y	Y	HEXACHLOROCYCLOHEXANE, [ALPHA-]	319-84-6	0.01	F	Y	N
DIMETHYL BENZIDINE, [3,3-]	119-93-7	0.008	V	Y	Y	HEXACHLOROCYCLOHEXANE, [BETA-]	319-85-7	0.01	F	Y	N
DIMETHYL CARBAMOYL CHLORIDE	79-44-7	0.02		Y	N	HEXACHLOROCYCLOHEXANE, [DELTA-]	319-86-8	0.01	F	Y	N
DIMETHYL FORMAMIDE	68-12-2	1		Y	N	HEXACHLOROCYCLOHEXANE, [TECHNICAL]	608-73-1	0.01	F	Y	N
DIMETHYL HYDRAZINE, [1,1-]	57-14-7	0.008		Y	N	HEXACHLOROCYCLOPENTADIENE	77-47-4	0.1		Y	N
DIMETHYL PHTHALATE	131-11-3	10		Y	N	HEXACHLOROETHANE	67-72-1	5		Y	N
DIMETHYL SULFATE	77-78-1	0.1		Y	N	HEXAMETHYLENE,-1,6-DIISOCYANATE	822-06-0	0.02		Y	N
DIMETHYLAMINOAZOBENZENE, [4-]	60-11-7	1		Y	N	HEXAMETHYLPHOSPHORAMIDE	680-31-9	0.01		Y	N
DIMETHYLANILINE, [N-N-]	121-69-7	1		Y	N	HEXANE, [N-]	110-54-3	10		Y	N
DINITRO-O-CRESOL, [4,6-] (Note 6)	534-52-1	0.1	E	Y	Y	HYDRAZINE	302-01-2	0.004		N	N
DINITROPHENOL, [2,4-]	51-28-5	1		Y	N	HYDROGEN CHLORIDE	7647-01-0	10		N	N
DINITROTOLUENE, [2,4-]	121-14-2	0.02		Y	N	HYDROGEN FLUORIDE	7664-39-3	0.1		N	N
DIOXANE, [1,4-]	123-91-1	6		Y	N	HYDROQUINONE	123-31-9	1		Y	N
DIPHENYLHYDRAZINE, [1,2-]	122-66-7	0.09	V	Y	Y	INDENO(1,2,3CD)PYRENE	193-39-5	0.01	V	Y	N

Chemical	CAS	SMAL (tpy)	Group ID	VOC	PM	Chemical	CAS	SMAL (tpy)	Group ID	VOC	PM
ISOPHORONE	78-59-1	10		Y	N	NITROBENZENE	98-95-3	1		Y	N
LEAD COMPOUNDS		0.01	Q	N	Y	NITROBIPHENYL, [4-]	92-93-3	1	V	Y	N
LINDANE [GAMMA- HEXACHLOROCYCLOHEXANE]	58-89-9	0.01	F	Y	N	NITROPHENOL, [4-]	100-02-7	5		Y	N
MALEIC ANHYDRIDE	108-31-6	1		Y	N	NITROPROPANE, [2-]	79-46-9	1		Y	N
MANGANESE COMPOUNDS		0.8	R	N	Y	NITROSODIMETHYLAMINE, [N-]	62-75-9	0.001		Y	N
MERCURY COMPOUNDS		0.01	S	N	N	NITROSOMORPHOLINE, [N-]	59-89-2	1		Y	N
METHANOL	67-56-1	10		Y	N	NITROSO-N-METHYLUREA, [N-]	684-93-5	0.0002		Y	N
METHOXYCHLOR	72-43-5	10	V	Y	Y	OCTACHLORONAPHTHALENE	2234-13-1	0.01	V	Y	N
METHOXYETHANOL, [2-]	109-86-4	10	P	Y	N	PARATHION	56-38-2	0.1		Y	Y
METHYL CHLORIDE	74-87-3	10		Y	N	PCB [POLYCHLORINATED BIPHENYLS]	1336-36-3	0.009	X	Y	Y
METHYL ETHYL KETONE (Delisted)	78-93-3					PENTACHLORONITROBENZENE	82-68-8	0.3		Y	N
METHYLCYCLOPENTADIENYL MANGANESE	12108-13-3	0.1	R	N	Y	PENTACHLOROPHENOL	87-86-5	0.7		Y	N
METHYLENE BIS(2-CHLOROANILINE), [4,4-]	101-14-4	0.2	V	Y	Y	PHENOL	108-95-2	0.1		Y	N
METHYLENEDIANILINE, [4,4-]	101-77-9	1	V	Y	N	PHENYLENEDIAMINE, [PARA-]	106-50-3	10		Y	N
METHYLNAPHTHALENE, [2-]	91-57-6	10	V	Y	N	PHOSGENE	75-44-5	0.1		Y	N
METHYL HYDRAZINE	60-34-4	0.06		Y	N	PHOSPHINE	7803-51-2	5		N	N
METHYL IODIDE	74-88-4	1		Y	N	PHOSPHOROUS (YELLOW OR WHITE)	7723-14-0	0.1		N	N
METHYL ISOBUTYL KETONE	108-10-1	10		Y	N	PROPIOLACTONE, [BETA-]	57-57-8	0.1		Y	N
METHYL ISOCYANATE	624-83-9	0.1		Y	N	PROPIONALDEHYDE	123-38-6	5		Y	N
METHYL METHACRYLATE	80-62-6	10		Y	N	PROPOXUR [BAYGON]	114-26-1	10		Y	Y
METHYL TERT-BUTYL ETHER	1634-04-4	10		Y	N	PROPYLENE OXIDE	75-56-9	5		Y	N
MINERAL FIBERS		0	T	N	Y	PTHALIC ANHYDRIDE	85-44-9	5		Y	N
NAPHTHALENE	91-20-3	10	V	Y	N	POLYCYCLIC ORGANIC MATTER		0.01	V	Y	N
NAPHTHYLAMINE, [ALPHA-]	134-32-7	0.01	V	Y	N	PROPANE SULTONE, [1,3-]	1120-71-4	0.03		Y	Y
NAPHTHYLAMINE, [BETA-]	91-59-8	0.01	V	Y	N	PROPYLENEIMINE, [1,2-]	75-55-8	0.003		Y	N
NICKEL CARBONYL	13463-39-3	0.1	U	N	Y	QUINOLINE	91-22-5	0.006		Y	N
NICKEL COMPOUNDS		1	U	N	Y	QUINONE	106-51-4	5		Y	N
NICKEL REFINERY DUST		0.08	U	N	Y	RADIONUCLIDES		Note 1	Y	N	Y
NICKEL SUBSULFIDE	12035-72-2	0.04	U	N	Y	SELENIUM COMPOUNDS		0.1	W	N	Y

Chemical	CAS	SMAL (tpy)	Group ID	VOC	PM	Chemical	CAS	SMAL (tpy)	Group ID	VOC	PM
STYRENE	100-42-5	1		Y	N	TRICHLOROPHENOL, [2,4,5-]	95-95-4	1		Y	N
STYRENE OXIDE	96-09-3	1		Y	N	TRICHLOROPHENOL, [2,4,6-]	88-06-2	6		Y	N
TETRACHLORODIBENZO-P-DIOXIN,[2,3,7,8]	1746-01-6	6E-07	D,V	Y	Y	TRIETHYLAMINE	121-44-8	10		Y	N
TETRACHLOROETHANE, [1,1,2,2-]	79-34-5	0.3		Y	N	TRIFLURALIN	1582-09-8	9		Y	Y
TETRACHLOROETHYLENE	127-18-4	10		N	N	TRIMETHYLPENTANE, [2,2,4-]	540-84-1	5		Y	N
TITANIUM TETRACHLORIDE	7550-45-0	0.1		N	N	URETHANE [ETHYL CARBAMATE]	51-79-6	0.8		Y	N
TOLUENE	108-88-3	10		Y	N	VINYL ACETATE	108-05-4	1		Y	N
TOLUENE DIISOCYANATE, [2,4-]	584-84-9	0.1		Y	N	VINYL BROMIDE	593-60-2	0.6		Y	N
TOLUIDINE, [ORTHO-]	95-53-4	4		Y	N	VINYL CHLORIDE	75-01-4	0.2		Y	N
TOXAPHENE	8001-35-2	0.01		Y	N	XYLENE, [META-]	108-38-3	10	G	Y	N
TRICHLOROBENZENE, [1,2,4-]	120-82-1	10		Y	N	XYLENE, [ORTHO-]	95-47-6	10	G	Y	N
TRICHLOROETHANE, [1,1,1-]	71-55-6	10		N	N	XYLENE, [PARA-]	106-42-3	10	G	Y	N
TRICHLOROETHANE, [1,1,2-]	79-00-5	1		Y	N	XYLENES (MIXED ISOMERS)	1330-20-7	10	G	Y	N
TRICHLOROETHYLENE	79-01-6	10		Y	N						

Legend					
Group ID	Aggregate Group Name	Notes	Group ID	Aggregate Group Name	Notes
A	Asbestos	2,5	N	Coke Oven Emissions	2,5
B	Cresols/Cresylic Acid (isomers and mixtures)	2,5	O	Cyanide Compounds	7,16
C	2,4 - D, Salts and Esters	6	P	Glycol Ethers	3,5
D	Dibenzofurans, Dibenzodioxins	10	Q	Lead Compounds (except elemental Lead)	2,4,8
E	4, 6 Dinitro-o-cresol, and Salts	6	R	Manganese Compounds	2,4
F	Lindane (all isomers)	3,5	S	Mercury Compounds	2,4
G	Xylenes (all isomers and mixtures)	5,12	T	Fine Mineral Fibers	1,2,5,22
H	Antimony Compounds	2,4	U	Nickel Compounds	2,4
I	Arsenic Compounds	2,4,18	V	Polycyclic Organic Matter	3,5
J	Beryllium Compounds	2,4	W	Selenium Compounds	2,4
K	Cadmium Compounds	2,4	X	Polychlorinated Biphenyls (Aroclors)	10
L	Chromium Compounds	4,11	Y	Radionuclides	2,9,24
M	Cobalt Compounds	2,4			

Column Identifiers	
Chemical	As identified in §112(b)(1) of the Clean Air Act Amendments of 1990, the name used in the Air Pollution Control Program's Chemical Database to identify a HAP or an aggregate group of HAPs. The table lists HAPs in alphabetical order.
CAS	The Chemical Abstracts Service (CAS) registry number for the HAP. In most instances, an aggregate group of HAPs does not have a CAS number because the purpose of a CAS number is to identify a specific chemical or compound
SMAL	Screening Model Action Level (SMAL) is the emission threshold level for modeling HAPs, as referenced in the 10 CSR 10-6.060(5)(F)6. The SMAL is also the emission threshold level for construction permit exemptions as referenced in 10 CSR 10-6.061(3)(A)3.B. Units are in tpy except where noted
Group ID	A value in this column indicates that the compound is classified as an aggregate group HAP. Emissions of compounds that are in the same aggregate group must be counted together.
VOC	If the value is Y, the HAP is classified as a Volatile Organic Compound (VOC) as defined in 10 CSR 10-6.020(2)(V). If the value is N, the HAP is not classified as a VOC. Emissions of HAPs that are also VOCs are counted in the emissions potential for both HAPs and VOCs. VOC classification was determined based on guidance in a memo from the chief of the Air Permits and Compliance Branch of EPA Region VII to the Director of the Air Pollution Control Program dated, April 18, 1996 and received, April 22, 1996.
PM	If the value is Y, the HAP is classified as particulate matter less than or equal to 10 microns in diameter (PM ₁₀) as defined in 10 CSR 10-6.020(2)(P). If the value is N, the HAP is not classified as a PM ₁₀ . Emissions of HAPs that are also PM ₁₀ are counted in the emissions potential for both HAPs and PM ₁₀ . PM ₁₀ classification was determined based on guidance in a memo from the chief of the Air Permits and Compliance Branch of EPA Region VII to the Director of the Air Pollution Control Program dated, April 18, 1996 and received, April 22, 1996.

Notes	
Note 1	Includes mineral fiber emissions from facilities manufacturing or processing glass, rock, or slag fibers (or other mineral derived fibers) of average diameter 1 micrometer or less.
Note 2	Emissions of compounds in this aggregate group are combined for comparison to the Major Source Thresholds. Except for those compounds specifically listed, emissions of compounds in this aggregate group are also combined for comparison to the SMALs and RALs.
Note 3	Emissions of compounds in this aggregate group are combined for comparison to the Major Source Thresholds but are not combined for comparison to the SMALs and RALs.
Note 4	The total mass of the compound is used to determine emissions for comparison to the Major Source Thresholds. The mass of the metal portion of the compound is used to determine emissions for comparison to the SMALs and RALs.
Note 5	The total mass of the compound is used to determine emissions for comparison to the SMALs, RALs, and Major Source Thresholds.
Note 6	The total mass of the compound is used to determine emissions for comparison to the Major Source Thresholds. For these compounds, emissions within the same aggregate group are combined for comparison to the SMALs and RALs, and the 2,4-D portion of 2,4-D Salts and Esters and the Dinitro-ortho-cresol (DNOC) portion of 4,6 Dinitro-o-cresol Salts are used to determine emissions for comparison to the SMALs and RALs.
Note 7	The total mass of the compound is used to determine emissions for comparison to the Major Source Thresholds. Except for those compounds specifically listed, emissions of cyanide compounds are combined and the mass of the cyanide portion (-C≡N) of the compound is used to determine emissions for comparison to the SMALs and RALs. For those compounds specifically listed in the table, emissions are not combined, and the total mass of the compound is used for comparison to the SMALs and RALs.
Note 8	Elemental lead is not considered a HAP. However, the lead portion of lead compounds (in addition to elemental lead) is considered a criteria pollutant and should be included in the lead criteria pollutant potential emissions calculations.
Note 9	The SMAL for radionuclides is defined as the effective dose equivalent to 0.3 millirems per year for 7 years exposure associated with a cancer risk of 1 in 1 million.

Notes					
Note 10	The RAL units for Dibenzodioxins/Dibenzofurans (Dioxins/Furans) and Polychlorinated biphenyls (PCBs) are picograms per cubic meter (pg/m³). For comparison to the Major Source Threshold combine emissions within each aggregate group and use the total mass of each compound. For comparison to the SMAL and RAL, emissions of polychlorinated dibenzodioxins & polychlorinated dibenzofurans (PCDD/PCDF) and polychlorinated biphenyls (PCB) are scaled according to the toxic equivalency factor method and then combined for comparison to the SMAL and RAL: For comparison to the SMAL: 1) scale the annual emissions of each PCDD/PCDF and PCB by its respective toxic equivalency factor (TEF) 2) after the emissions are scaled, combine them into a single potential annual emissions (tpy) for comparison to the SMAL For comparison to the RAL: 1) scale the annual emissions of each PCDD/PCDF and PCB by its respective toxic equivalency factor (TEF) 2) after the emissions are scaled, combine them into a single emission rate (lb/hr) or (grams/second) for modeling 3) the resulting ambient concentration is compared to the RALs for Dioxins/Furans				
	Toxic Equivalency Factors for PCDD, PCDF, and PCB compounds				
	PCDDs	TEF	PCDFs	TEF	PCBs
	2,3,7,8-TCDD	1.0	2,3,7,8-TCDF	0.1	3,3',4,4'-TCB (77)
	1,2,3,7,8-PeCDD	1.0	1,2,3,7,8-PeCDF	0.03	3,4,4',5-TCB (81)
	1,2,3,4,7,8-HxCDD	0.1	2,3,4,7,8-PeCDF	0.3	3,3',4,4',5-PeCB (126)
	1,2,3,7,8,9-HxCDD	0.1	1,2,3,4,7,8-HxCDF	0.1	3,3',4,4',5,5'-HxCB (169)
	1,2,3,6,7,8-HxCDD	0.1	1,2,3,7,8,9-HxCDF	0.1	2,3,3',4,4' PeCB (105)
	1,2,3,4,6,7,8-HpCDD	0.01	1,2,3,6,7,8-HxCDF	0.1	2,3,4,4',5 PeCB (114)
	1,2,3,4,6,7,8,9-OCDD	0.0003	2,3,4,6,7,8-HxCDF	0.1	2,3',4,4',5 PeCB (118).
			1,2,3,4,6,7,8-HpCDF	0.01	2',3,4,4',5 PeCB (123)
			1,2,3,4,7,8,9-HpCDF	0.01	2,3,3',4,4',5-HxCB (156)
			1,2,3,4,6,7,8,9-OCDF	0.0003	2,3,3',4,4',5-HxCB (157)
					2,3',4,4',5,5'-HxCB (167)
					2,3,3',4,4',5,5'-HpCB (189)
Note 11	Emissions of compounds in this aggregate group are combined for comparison to the Major Source Thresholds. Chromium (VI) compounds, also known as hexavalent chromium compounds, are combined for comparison to the SMAL and RALs for Chromium (VI) compounds. Chromium Compounds of all other oxidation states [i.e. excluding Chromium (VI) Compounds] are combined for comparison to the SMALs and RALs for Chromium Compounds.				
Note 12	Emission of all isomers of Xylenes are combined for comparison to the Major Source Thresholds. Although each isomer is specifically listed, they are not evaluated separately. Emissions of all isomers are combined and compared to the SMAL and RALs for any of the listed isomers as they are all the same				
Note 13	The RAL units for asbestos are fibers/mL (or fibers per cm ³).				
Note 14	The RAL units for Nitroso-N-Methylurea, [N-] (CAS 684-93-5) are nanograms per cubic meter (ng/m ³).				
Note 15	The 1-hour RAL for Dichloroethylether (CAS 111-44-4) is 0.287 milligrams per cubic meter (mg/m ³).				
Note 16	The 1-hour RAL for Cyanide Compounds is 11 milligrams per cubic meter (mg/m ³).				
Note 17	The acute RAL for Hydrogen Fluoride (CAS 7664-39-3) for an exposure period between one and 14 days is 16 micrograms per cubic meter (µg/m ³).				
Note 18	The 4-hour RAL for Arsenic Compounds is 0.19 micrograms per cubic meter (µg/m ³).				

Notes	
Note 19	The 1-hour RAL for hydrogen chloride is 2,100 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$).
Note 20	X'CN where X = H' or any other group where a formal dissociation may occur. (For example KCN or $\text{Ca}(\text{CN})_2$)
Note 21	Glycol ethers include mono- and di-ethers of ethylene glycol, diethylene glycol, and triethylene glycol $\text{R}-(\text{OCH}_2\text{CH}_2)_n-\text{OR}'$. Where: n = 1, 2, or 3; R = alkyl C7 or less; or R = phenyl or alkyl substituted phenyl; R' = H or alkyl C7 or less; or OR' consisting of carboxylic acid ester, sulfate, phosphate, nitrate, or sulfonate.
Note 22	Fine mineral fibers include mineral fiber emissions from facilities manufacturing or processing glass, rock, or slag fibers (or other mineral derived fibers) of average diameter 1 micrometer or less.
Note 23	POM includes organic compounds with more than one benzene ring, and which have a boiling point greater than or equal to 100°C.
Note 24	Radionuclides are a type of atom which spontaneously undergoes radioactive decay.

²⁸ 12-Month Total VOC Emissions of **less than 250 tons** indicates compliance with Permit Condition PW001.

³⁷ 12-Month Total Individual HAP Emissions of **less than** the **SMAL** given in **Attachment G** indicates compliance with Permit Condition PW001.

⁴⁰ 12-Month Total Combined HAP Emissions of **less than 25.0 tons** indicates compliance with Permit Condition PW001.

Attachment K
40 CFR Part 63 Subpart HHHHHH Exemption Letter

The following letter was sent from the EPA to Hutchens Industries, Inc. Mansfield.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 Renner Boulevard
Lenexa, Kansas 66219

MAY 13 2019

Mr. Kevin Dobson
Hutchens Industries Inc.
898 E. Commercial Street
Mansfield, Missouri 65704

RE: Petition for Exemption from 40 CFR Part 63, Subpart HHHHHH

Dear Mr. Dobson:

This letter is in response to your Petition for Exemption we received on November 29, 2018, requesting exemption for Hutchens Industries Inc. located at 898 E. Commercial Street Mansfield, Missouri, from the National Emission Standards for Organic Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at 40 CFR Part 63, Subpart HHHHHH.

To obtain an exemption, 40 CFR Section 63.1170(a)(2) requires that as an owner or operator of motor vehicle and mobile equipment surface coating operations you demonstrate, to the EPA's satisfaction, that you spray apply no coatings that contain the target HAP, as defined in §63.11180. The petition must include a description of the coatings that your spray applies and your certification that you do not spray apply any coatings containing the target HAP.

Based on the information provided in your petition for the exemption and your signed certification that none of the coatings sprayed at the facility contain the target HAP, Hutchens Industries Inc, in Mansfield Missouri is exempt from Subpart HHHHHH requirements for its spray-applied coating activities.

Keep a record of this exemption on site at your operation headquarters for as long as you perform motor vehicle and mobile equipment surface coating operations. If circumstances change such that your facility intends to spray apply coatings containing any target HAP, the owner or operator must submit the initial notification required by Section 63.11175 and comply with the requirements of this subpart.

This exemption is based on information that you have provided to us. Nothing in this exemption shall be construed as limiting the ability of the EPA or delegated agencies to pursue enforcement action, if it is determined that your facility was not eligible for this exemption or for any other violations under the Clean Air Act. Providing false information to a federal official is a criminal violation pursuant to federal law, 18 U.S.C. Section 1001.

If you have any questions regarding this response, please contact Joe Terriquez (913) 551-7105.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey L. Field".

Jeffrey L. Field
Chief, Air Branch
Enforcement and Compliance Assurance Division

cc: Richard Swartz, MoDNR-
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102-0176

Response to Public Comments

The draft Part 70 operating permit, Project 2023-09-019, for Hutchens Industries, Inc. Mansfield (229-0001) was placed on public notice as of **Date** for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: <https://dnr.mo.gov/air/what-were-doing/public-notice>.

If comments were received:

Description of Quantity of Comments Received, whom by, date received, etc. The comments are addressed in the order in which they were received

X Comment #: XXXX

Response to Comment:

If no comments were received:

No comments were received during the public notice period.

Response to Public Comments Email to Applicant

Use the following text for the body of the response to public comments email. The subject line should read –

Part 70 Operating Permit for Hutchens Industries, Inc. Mansfield, Project 2023-09-019

If comments were received:

The Missouri Air Pollution Control Program received comments submitted during the public comment period on the draft Part 70 Operating Permit for Hutchens Industries, Inc. Mansfield. The Air Pollution Control Program has revised your draft operating permit in response to all comments received. Attached is the Air Pollution Control Program's response to these comments and a copy of the revised operating permit which is being submitted to EPA for their review.

EPA has 45 days from the receipt of this operating permit to notify the Missouri Air Pollution Control Program of any objections. If EPA has no objections, your operating permit will be issued shortly after this period. If EPA does have objections, additional changes or revisions to the operating permit may be required to respond to EPA's comments.

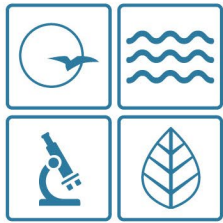
If you have any questions or additional comments, please contact me at Air Pollution Control Program, PO Box 176, Jefferson City, MO 65102 or by telephone at **your phone number**. Thank you for your time and attention.

If comments were not received:

The Missouri Air Pollution Control Program did not receive comments during the public comment period on the draft Part 70 Operating Permit for Hutchens Industries, Inc. Mansfield. The draft permit is being forwarded to EPA for their review.

EPA has 45 days from the receipt of this operating permit to notify the Missouri Air Pollution Control Program of any objections. If EPA has no objections, your operating permit will be issued shortly after this period. If EPA does have objections, additional changes or revisions to the operating permit may be required to respond to EPA's comments.

If you have any questions or additional comments, please contact me at Air Pollution Control Program, PO Box 176, Jefferson City, MO 65102 or by telephone at **your phone number**. Thank you for your time and attention.



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Mike Kehoe
Governor

Jake Buxton
Director

Month DD, YYYY

Kevin Dobson
HR Director
Hutchens Industries, Inc. Mansfield
P.O. Box 137
Mansfield, MO 65704

Re: Hutchens Industries, Inc. Mansfield, 229-0001
Permit: #####-###

Dear Kevin Dobson:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at <https://dnr.mo.gov/about-us/division-environmental-quality/regional-office>. The online CAV request can be found at <https://dnr.mo.gov/compliance-assistance-enforcement/request-visit>.

You may appeal this permit to the Administrative Hearing Commission as provided in §§643.078.16 and 621.250 RSMo. To appeal, you must file a petition with the administrative hearing commission 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, PO Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: <https://ahc.mo.gov/>.



Kevin Dobson

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If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program at 573-751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, PO Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Ryan Reed
Unit Chief

RR:bkh

Enclosures

c: PAMS File: 2023-09-019
Southwest Regional Office